



Fraud and Corruption Prevention Framework

Office of Risk, Assurance and Compliance

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University Operations

Risk, Assurance and Compliance

Campus and Collegiate Life Services | Campus Development | Chief Operating Officer
Health and Safety Compliance | Information Technology Services | Project Management
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University of Otago | PO Box 56 | Dunedin 9054 | New Zealand

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1. INTRODUCTION

This document has been prepared by the Office of Risk Assurance and Compliance (ORAC). It outlines the University of Otago's (the University) plan to prevent fraud and corrupt conduct. The purpose of this document is to assist the University to manage these risks.

The document is written for use by University governance and committees, executive management, Heads of Departments, and all staff (including those with honorary or unpaid status) and contractors.

The University's Fraud and Corruption Prevention Framework is designed to integrate all associated processes/activities undertaken into a central document for easy reference by management and staff. These activities include planning, prevention, detection and responding, as well as policy and legislation, and leadership and culture as demonstrated below.



Figure 1: The Fraud Control Framework

This is a reference text, designed to be consulted when appropriate. It is not meant to be read in a linear fashion. This document is organised in the following way:

Section 2 details how the University defines fraud and corrupt conduct as well as detailing high-level responsibilities for the prevention of fraud and corrupt conduct.

Section 3 details the University's expectations regarding roles and responsibilities.

Section 4 details the strategies used by the University to prevent fraud and corrupt conduct.

Section 5 details the strategies used by the University to detect fraud.

Section 6 details the how the University responds to fraud and corrupt conduct when it has been detected.

Section 7 details how the University continually reviews the Fraud and Corruption Prevention Framework.

Appendix 1 provides a summary of all fraud and corruption prevention activities and responsibilities.

This framework has been written to comply with Australian Standard AS8001-2008 Fraud and Corruption Control. ORAC is always available to assist you in applying this framework and the activities it promotes. Please contact the team directly (fraud@otago.ac.nz) if you have any questions or concerns.

2. DEFINITION OF FRAUD AND CORRUPTION

2.1. Definition of Fraud

Fraud is defined as all acts of deception, misrepresentation or omission committed with the intention of gaining an unjust or illegal financial or non-financial advantage, whether for oneself or a third party. The theft of assets or inventory belonging to the University by a staff member is also considered fraud, even where deception is not used.

The risk of fraud can come from inside the University, i.e., from employees or contractors. The risk of fraud can also come from outside the University, i.e., external parties such as clients, consultants, service providers or other members of the public.

The most common risks of fraud to the University include:

- False invoicing/fake suppliers (creation of a fictitious invoice claiming payment for goods or services not delivered or exaggerating the value of goods delivered or services provided).
- Cyber-attacks/ransomware
- Phishing attacks.
- Academic fraud.
- Theft of intellectual property or other confidential information, including student records.
- Theft of cash, inventory or plant and equipment.
- Accounts Receivable fraud (misappropriation or misdirection of remittances received by the University from a debtor including students).
- Credit card or reimbursement fraud.
- Financial reporting fraud (falsification of the financial statements with a view to obtaining some form of improper financial benefit).
- Employment fraud, e.g., creating false employees, knowingly not booking leave, or submitting false timesheets.
- Purchasing – false invoicing, bribes/kickbacks, split purchasing (to avoid breaching approval limit), bid rigging.
- Purchasing activity which deliberately fails to follow the procurement policy or seek the necessary approval.
- Research grants and contracts – sub contractors billing for work not performed, overcharging, absence of competitive bids for work.

2.2. Definition of Corruption

Corruption is defined as the lack of integrity or honesty (typically involving bribery) or the abuse of a position of trust for dishonest gain. It can include bribery (both domestic and foreign), coercion, destruction, removal or inappropriate use or disclosure of records, data, materials, intellectual property or assets, or similar forms of inappropriate conduct.

Corruption can take various forms, including secret commissions, kickbacks, bribes and other forms of unlawful payments. Corruption also encompasses a number of offences such as abuse of positions of power and money laundering.

The most common risks of corruption to the University include:

- Payment or receipt of secret commissions (bribes), which may be paid in money or in some other form of value to the receiver and may relate to a specific decision or action by the receiver or generally (e.g., extravagant gifts and benefits paid to an employee).
- Release of confidential information, including student records, for other than a proper business purpose in exchange for some form of non-financial benefit or advantage.
- Collusive tendering (the act of multiple tenderers for a particular contract colluding in preparation of their bids).
- A conflict of interest involving a staff member who acts in his or her own self-interest rather than the interests of the University (e.g., failing to declare an interest in a transaction the University is about to enter into).
- Manipulation of the procurement process by favouring one tenderer over others or selectively providing information to some tenderers. This frequently involves allowing tenderers to resubmit a 'non-complying' tender after being provided with the details of other bids.
- Gifts or entertainment intended to influence decisions e.g. purchase without appropriate competitive process, academic grades, undue influence staff recruitment. Bribing officials (locally or in foreign jurisdictions) in order to secure a contract for the supply of goods or services, or in the recruitment of students.

2.3. Definition of the Term Fraud and Corruption in this Document

The term Fraud and Corruption will be used throughout this framework to refer to instances of Fraud and Corruption as defined in 2.1 and 2.2.

2.4. Commitment to Preventing Fraud and Corruption

Fraud and corrupt conduct damages the reputation of the University and depletes the University's resources. Accordingly, the University has a zero tolerance to either, whether by staff or other persons.

2.5. Fraud and Corruption Conditions

The four generally recognised conditions for fraud and corruption to occur are:

- The presence of an opportunity (poor internal and external controls).
- A motivated offender.
- Rationalisation (justification by the individual for the fraudulent activity).
- Capacity to commit fraud and corruption.

This Fraud and Corruption Prevention Framework has been written to address these conditions within the University.

3. Roles and responsibilities

3.1. Leadership and Culture (Tone at the top)

The leadership demonstrated by senior management, i.e., members of the Vice-Chancellor's Advisory Group (VCAG), plays an important role with respect to controlling fraud and corruption by role-modelling and communicating the importance of:

- Ethical behaviour.
- Attending fraud training.
- Checking that controls are in place, and that their direct reports are adhering to policies and processes.

3.2. Roles and Accountabilities for Control of Fraud and Corruption

The following University roles have specific responsibilities in relation to fraud and corruption prevention.

Role	Responsibilities
Council	<ul style="list-style-type: none">• Ensuring that appropriate governance mechanisms and corruption prevention frameworks are in place and operating as designed.
Audit and Risk Committee	<ul style="list-style-type: none">• Reviewing the University's Risk Management Framework and associated procedures for the effective identification and management of the University's financial and business risks, including fraud risks.• Overseeing the process of developing and implementing the Fraud and Corruption Prevention Framework, to provide assurance that the University has appropriate processes and systems in place to prevent, detect and effectively respond to fraud. Management, however is primarily responsible for fraud prevention and detection.• Approving the internal audit programme.

Role	Responsibilities
Vice-Chancellor and Vice-Chancellor's Advisory Group	<ul style="list-style-type: none"> Ensuring the sound operation of the control environment and the fraud control activities. Responsible for ensuring that policies are in place and updated. Fostering an environment which promotes the highest standards of ethical behaviour. Delegates responsibility for the implementation and maintenance of this framework to _____(TBE).
COO/Director responsible for implementing the framework	<ul style="list-style-type: none"> Develop, implement and maintain the Fraud and Corruption Prevention Framework Facilitate a fraud and corruption risk assessments Ensure fraud and corruption staff awareness training programs are in place
Director of Human Resources	<ul style="list-style-type: none"> Responsible for determining who will conduct an investigation into a suspected fraud or corruption. Coordinate investigations in relation to incidents of suspected fraud and/or corruption
Office of Risk, Assurance and Compliance, Vice Chancellor, Chief Operating Officer, Chief Financial Officer, Director of Human Resources.	<ul style="list-style-type: none"> People to whom notification of suspected cases of fraud or corruption should be made.
Office of Risk, Assurance and Compliance	<ul style="list-style-type: none"> Providing assurance to the senior management, Council and the Audit and Risk Committee that the financial and operational controls designed to manage the University's risks and achieve the University's objectives are operating in an efficient, effective and ethical manner. Carry out policy compliance activities. Undertaking investigations. Regularly communicating the University's attitude to fraud and corruption, and the related policies and procedures. Facilitating training programmes for staff.
Line Managers (Directors, Heads of Department)	<ul style="list-style-type: none"> Encouraging staff to attend fraud control training as appropriate and that staff are well trained. Ensuring that internal controls and University policy are adhered to within their areas of responsibility.
All Employees	<ul style="list-style-type: none"> Reporting suspected instances of fraud or corruption in-line with the requirements of the Fraud Policy and this Framework. Familiarising themselves with the University's Fraud Policy.

3.3. University's Designated Fraud Prevention Officer

The Head of Risk, Assurance and Compliance is designated as the University's Fraud Prevention Officer.

This role of Fraud Prevention Officer includes responsibility for understanding and translating current best practice in fraud control into user-friendly practices and procedures in addition to delivering/coordinating training on relevant procedures, particularly to line management.

The Fraud Prevention Officer will ensure that the University's annual Audit Plan is developed and conducted in accordance with the provisions of The Professional Practices Framework (PPF) of the Institute of Internal Auditors.

4. PREVENT

Prevention strategies are designed to limit the opportunities to commit fraud.



4.1. Policies Related to Fraud

The University has a number of policies with associated procedures that are designed to prevent or reduce the risk of fraud and corrupt conduct. The pertinent aspects of these policies are outlined here for easy reference.

Policy	Fraud-related Provision
Ethical Behaviour Policy	<ul style="list-style-type: none">• Requires all members of the University community to be courteous, honest, fair, timely and ethical in their dealings, and clearly states that failure to declare a conflict or potential conflict of interest is a breach of this policy.
Fraud and Corruption Prevention Framework	<ul style="list-style-type: none">• The University will maintain a zero tolerance to fraud and will investigate any suspected fraud.• All staff are obligated to report fraud to either:<ul style="list-style-type: none">○ Office of Risk, Assurance and Compliance○ Vice-Chancellor○ Chief Operating Officer○ Chief Financial Officer○ Director Human Resources○ Fraud email address: fraud@otago.ac.nz○ Fraud phone number: 03 479 8555

Policy	Fraud-related Provision
Protected Disclosures Policy and Procedure	<ul style="list-style-type: none"> • Stipulates that a person who reports an act of serious wrongdoing is protected by the Protected Disclosures Act. • Current, former, contracted or seconded staff can make an allegation of serious wrongdoing within the University, including fraud. • All protected disclosures should be made to the Director, Human Resources as the University's Disclosure Officer. • Every person to whom a protected disclosure is made or referred must use his or her best endeavours not to disclose information that might identify the staff member who made the protected disclosure.
Conflicts of Interest Policy	<ul style="list-style-type: none"> • Staff who are in a position to influence any decision relating to the supply of goods and services to the University shall notify their Head of Department if they, directly or indirectly, hold any financial or other interest in an external organisation negotiating with the University for the supply of goods or services. • Staff shall not recommend to the University an external organisation as a potential supplier without disclosing any interest held. • Staff shall not use confidential information relating to the University acquired during their employment to help any potential supplier of goods and services to the University achieve advantage over other potential suppliers.
Sensitive Expenditure Policy	<ul style="list-style-type: none"> • States that expenditure decisions must: <ul style="list-style-type: none"> ○ have a justifiable business purpose, ○ preserve impartiality, ○ be made with integrity, ○ be moderate and conservative, having regard to the circumstances, ○ be made transparently, and be appropriate in all respects.
Purchase Card Policy	<ul style="list-style-type: none"> • Purchase Cards must only be used to pay for goods and services where the expenditure is business related and is incurred on behalf of the University.
Acceptance of Gifts Policy	<ul style="list-style-type: none"> • University staff must not abuse their position for personal gain. They must not solicit or accept gifts, rewards or benefits which might compromise their integrity and the integrity of their department and/or the University.
Travel Related Costs Policy	<ul style="list-style-type: none"> • Sets out the University's position in relation to staff members travelling on University-related business.
Procurement Policy	<ul style="list-style-type: none"> • Contains information on the University's rules related to probity and conflict of interest in procurement decision making.
ICT Regulations 2014	<ul style="list-style-type: none"> • Places restrictions on the use of University information technology for accessing objectionable, illegal or fraudulent content, unreasonable use for personal purposes, and deceiving others.

4.2. Line Managers' Responsibilities

Controlling fraud is an important part of line managers' responsibilities.

It is University practice to allocate any losses due to fraud against the cost centre in which the loss occurred. This is to create an incentive for the manager of each cost centre to ensure that controls are in place and being adhered to.

4.3. Training for controlling fraud and corruption

Training in relation to fraud is currently provided through Financial Services Division's Financial Training for University of Otago staff and as part of the Academic Leadership Programme.

Fraud Awareness Training for staff is currently available on request. This training is designed to give staff an awareness of:

- Factors present for fraud to occur.
- Potential red flags.
- Common and emerging fraud methods.
- Employee role in improving fraud environment.

A more targeted programme is delivered to the following groups who are considered to have a significant role within the fraud control environment:

- Line Managers (Heads of Department, Heads of Service Division).
- Client Services (including HR Service, Supply Chain, Accounts Payable, Revenue Management).
- Financial Services Division.

This targeted training is delivered, at a minimum, every three years so that emerging trends can be identified as well as serving as a reminder to key staff of their obligations and for general awareness.

4.4. Internal Controls

The University has a number of internal control systems and processes in place to prevent fraud, such as 'one-up' approval of PCard transactions.

The following factors are important for any internal controls to be robust:

- Internal controls need to respond to the identified fraud risks
- Internal controls need a process of continuous improvement and should be reviewed and amended regularly.
- Internal controls must be effectively communicated to employees (appropriate to their level of responsibility and position description).
- All personnel should understand the importance of adhering to internal controls and why internal controls exist.
- Senior management should set an example of internal control adherence.
- Compliance activities undertaken to confirm internal controls are effective.

4.5. Fraud Risk Assessment

ORAC will perform annual formal fraud risk assessments through:

- Considering current processes and procedures.
- Facilitated workshops and discussions with a variety of senior teams.
- Research into current fraud trends in other universities and other industry.

The results of this analysis will be used as an input to the Internal Audit programme to ensure that risks with a high probability and impact are thoroughly investigated.

4.6. Communication and Awareness

ORAC will annually communicate to all staff:

- The existence of the fraud policy.
- A clear definition of the types of behaviour that constitute fraudulent or corrupt practice.
- An unequivocal statement that fraudulent and corrupt practices within the University will not be tolerated.

The Fraud and Corruption Prevention Framework is available to all staff at all times and is provided to staff as part of their induction process.

4.7. Employment Screening

Employment screening is undertaken at the University. This is undertaken at the discretion of the hiring manager and will usually be organised by Human Resources Recruitment.

Robust employment screening processes can help prevent the employment of people with a history of dishonest conduct which in turn can reduce the risk of fraudulent or corrupt conduct.

4.8. Supplier Vetting

Accounts Payable undertakes the following checks on new suppliers and customers:

- Bank account verification standards,
- search of company register,
- IRD number confirmation,
- telephone listing and trading address verification, and
- media search.

The bank account verification process includes Accounts Payable contacting suppliers to confirm bank account changes using a phone number on record or externally sourced and not related to the communication of the bank account change.

The supplier vetting processes in place represent best practice in the area, although this environment can see rapid changes and controls need to be monitored on a continuing basis.

4.9. Cyber Security Strategies

Cyber security focuses on protecting computer systems and their components – including hardware, software and data – and digital infrastructure from attack, unauthorised access or being otherwise damaged or made inaccessible. Data centres, websites, programmes, servers or accounts can all be exploited through a cyber-attack.

IT Assurance and Cyber Security of Information Technology Services are responsible for maintaining the cyber security control environment and responding the cyber threats. The approach to this is documented in the Cyber Security Framework.

5. DETECT

Detection strategies are the processes and controls designed to detect fraud after it has occurred.

5.1. Responsibility for Fraud Detection Program



Responsibility for developing systems to investigate and detect fraud rests with ORAC as part of the Fraud Prevention Officer duties.

5.2. Post Transactional Review

The following post transactional checks are designed to identify transactions or behaviour that may be indicative of fraud:

- Creditor's Supplier master file review of new and changed bank accounts. This review is completed monthly.
- Review of high-risk journal types created and posted by the same user. This review is completed monthly.
- Review of expenses incurred outside of system mandated delegation limits. This includes employees that have a split delegation level required for operating and capital expenditure or the discharge of liabilities previously approved. This review is completed when the transactions occur.
- PCard review. This review is completed monthly.
- Annual Leave review against travel insurance bookings. This review is completed annually.
- These reviews are currently completed by staff within ORAC.

5.3. Suspicious Transaction Analysis/Data Mining

ORAC is responsible for an annual suspicious transaction analysis. A data mining process extracts the previous year's data for interrogation and investigation. The data mining techniques used include, but are not limited to:

- Relationship mapping between employee and supplier information.
- IRD number validity.
- Identify duplicate payments.
- Identify unusual patterns such as round invoice numbers or consecutive invoices.
- Identify transactions processed outside normal working hours or on public holidays.
- Identify unusual trends in creditor usage and values.

5.4. Analysis of Management Accounting Reports

The analysis of management accounting reports can reveal anomalies which may be indicative of fraud. These include:

- Monthly 'actual versus budget' comparison for individual cost centres, and
- comparing expenditure against prior periods to highlight unusual trends which should be further investigated.

Financial Services Advisory staff review the management accounts of all divisions on a monthly basis and are aware of the need to remain alert for any unusual activities or trends.

5.5. The External Auditor's Role in the Detection of Fraud

Although the external auditors have some accountability for detection of material fraud this is not their primary function in performing an audit.

ORAC and the Audit and Risk Committee will work with the External Auditor by:

- Discussing the University's fraud environment and risk areas.
- Discussing the audit procedures that will be carried out during the audit that are aimed at detecting material misstatements in the University's financial statements due to fraud or error.
- Offering such assistance as the auditor may require to enable a more comprehensive examination of any issues.
- Notifying the auditor on identified frauds.
- The External Auditor is expected to notify ORAC and the Audit and Risk Committee of any suspected instances of fraud, any identified fraud control risks and any weaknesses in internal controls that enhance the risk of fraud.

5.6. Mechanisms for Reporting Suspected Fraud

The University's Fraud Policy allows for notification of suspected frauds to be made to:

- ORAC
- Vice-Chancellor
- Chief Operating Officer
- Chief Financial Officer
- Director of Human Resources
- Fraud email address: fraud@otago.ac.nz
- Fraud phone line: 03 479 8555
- Fraud web form: <https://www.otago.ac.nz/risk/fraud/index.html>

5.7. Protected Disclosures Policy

The University has a Protected Disclosures Policy that allows for staff, former staff, seconded staff and contracted staff to be afforded protection when reporting serious wrongdoing.

6. RESPOND

Response strategies are the processes undertaken when fraud has been detected.



6.1. Investigating Suspected Fraud

An investigation into apparent or suspected fraud will be conducted by appropriately skilled and experienced personnel who are independent of the business unit in which the alleged fraudulent or corrupt conduct occurred.

The Director of Human Resources will establish investigations in accordance with the applicable Human Resources processes.

6.2. Internal Reporting and Escalation

A fraud incident register is maintained by the Fraud Prevention Officer and includes the following information in relation to every reportable fraud incident:

- Date and time of report.
- Date and time that incident was detected.
- How the incident came to the attention of management.

- The nature of the incident.
- Value of loss (if any) to the University.
- The action taken following discovery of the incident.

The Fraud Prevention Officer will prepare a report to the Vice-Chancellor and Audit and Risk Committee on every investigation completed.

6.3. Disciplinary Processes

The party responsible for conducting the investigation is not responsible for determining any disciplinary action. Any disciplinary action should be conducted through the Director of Human Resources.

The ultimate outcome of disciplinary proceedings may involve the admonition or termination of an employee.

6.4. External Reporting

Should an investigation provide sufficient evidence to suggest that fraud has been committed, the Vice-Chancellor or their nominee will refer the circumstances to the relevant authorities for the purposes of investigation and possible prosecution.

6.4.1. Format for Reports to Law Enforcement Agencies

At a minimum, the following items should be provided to the law enforcement agency:

- A summary of the allegations.
- A list of witnesses and potential witnesses.
- A list of suspects and potential suspects.
- Copies of all statements, depositions or affidavits obtained to that point including and in particular, any written statement made by the subject of the investigation.
- A copy of the transcript of any interview conducted with a person suspected of involvement in the matters alleged.
- A copy of any electronic media on which such interviews have been recorded.
- Copies of all documentary evidence obtained to that point (ultimately the law enforcement agency will probably require the original documents, in which case copies should be retained by the University).
- Any charts or diagrammatical summaries of the allegations and evidence that the University may have produced.

6.4.2. Commitment to Assist Law Enforcement

In the event that a decision is made to refer the matter to the appropriate law enforcement agency, the Vice-Chancellor or their nominee will give an undertaking to the law enforcement agency that it will do all that is reasonable in assisting the law enforcement agency to conduct a full and proper investigation.

6.5. Internal Control Review Following Discovery of Fraud

In each instance where fraud is detected, the Fraud Prevention Officer and line management will reassess the adequacy of the internal control environment (particularly those controls directly impacting on the fraud incident and potentially allowing it to occur) and consider whether improvements are required.

Where improvements are required, these should be implemented as soon as practicable.

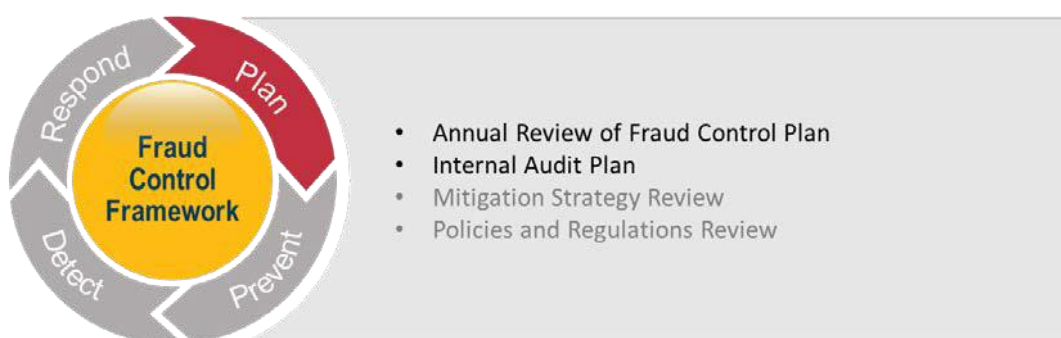
6.6. Maintaining Adequate Insurance Cover

The University maintains adequate insurance to cover for significant loss due to fraud.

Financial Services reviews the insurance cover on an annual basis and recommends appropriate cover to the Audit & Risk Committee for approval.

7. PLAN/MONITOR/EVALUATE

The following section identifies the desired state of the planning, monitoring and evaluation strategies.



7.1. Review of the Fraud and Corruption Prevention Framework

The University's Fraud and Corruption Prevention Framework is living document which will evolve depending on the University's circumstances and environment.

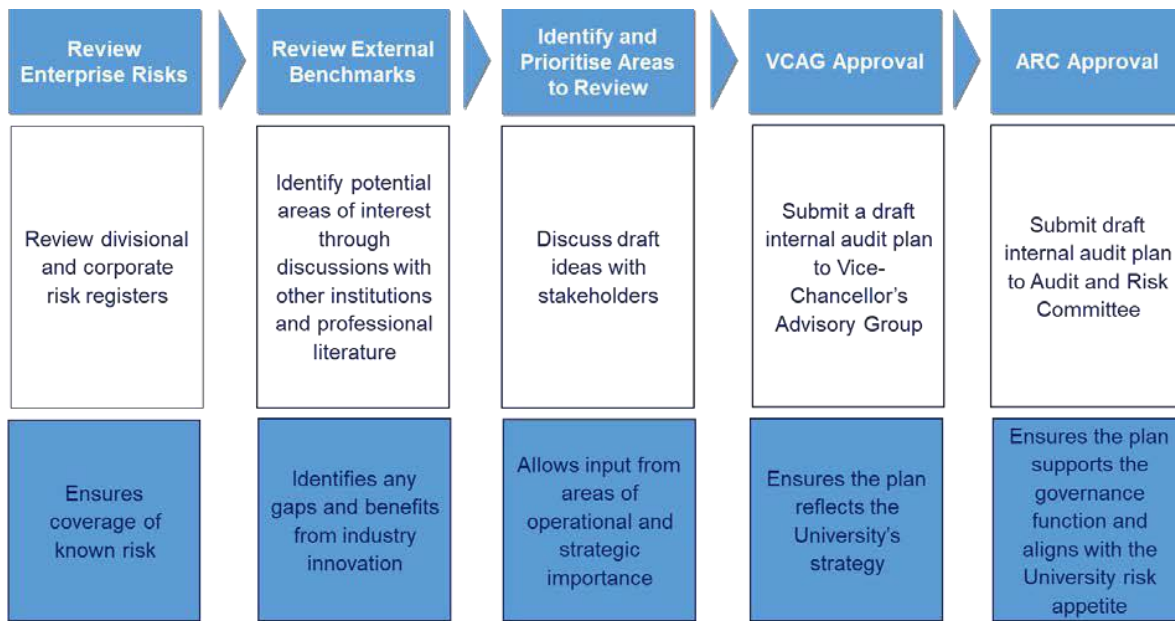
This Framework will be reviewed annually by ORAC taking into account events throughout the year, feedback from stakeholders and reviews of best practice.

Any suggested changes to this framework will be presented to Council for approval.

7.2. The Three Year Internal Audit Plan

The Internal Audit Plan is developed on a risk-weighted basis to address areas of critical concerns.

It is developed in consultation with a wide range of internal stakeholders to help ensure that it addresses the areas of highest risk as detailed below.



The Plan covers a three year term and is reviewed quarterly by the Audit and Risk Committee.

Appendix 1: Summary of Fraud Activities and Responsibilities

Our Fraud and Corruption Prevention Framework is a component of a broader integrated governance framework. Its co-dependency with a number of other University policies, plans and procedures is outlined below.

Name	Action	Responsible officer	Cycle
Ethical Behaviour Policy	Review the Ethical Behaviour Policy	Director, Human Resources	5 years
Protected Disclosures Policy	Review the Protected Disclosures Policy	Director, Human Resources	5 years
Conflicts of Interest Policy	Review the Conflict of Interest Policy	ORAC	5 years
Sensitive Expenditure Policy	Review the Sensitive Expenditure Policy	Financial Controller	2 years
Sensitive Expenditure Procedure and Guidelines	Review the Sensitive Expenditure Procedure and Guidelines	Financial Controller	2 years
Purchase Card Policy	Review the Purchase Card Policy	Financial Controller	5 years
Purchase Card Procedure	Review the Purchase Card Procedure	Financial Controller	5 years
Acceptance of Gifts, Benefits and Gratuities Policy	Review the Acceptance of Gifts, Benefits and Gratuities Policy	Financial Controller	5 years
Travel and Travel Related Costs Policy	Review the Travel Related Costs Policy	Director, Human Resources	5 years
Travel Planning Procedure	Review the Travel Planning Procedure	Senior Manager Procurement	2 years
Procurement Policy	Review the Procurement Policy	Senior Manager Procurement	2 years
VCAG Fraud Training	Training for VCAG	ORAC	One off
Fraud risk assessment	Conduct a fraud risk assessment	ORAC	Annually
Fraud risk register	Maintain and regularly report to the Audit and Risk Committee a Fraud risk register	ORAC	Ongoing

Name	Action	Responsible officer	Cycle
Fraud awareness training	All line manager staff and employees in designated positions undergo fraud awareness training	ORAC	3 years
Fraud Policy training	Fraud Policy training to be made available for all staff so they understand the University's expectations on what constitutes fraud and who fraud is reported to	ORAC	Ongoing
Employee background checks	Employment screening processes	Director, Human Resources	Ongoing
Supplier vetting	All new suppliers are subject to vetting	Director, Shared Services	Ongoing
Payroll and On-boarding internal audit	Determining whether controls within the payroll process exist to ensure the completeness, accuracy and validity of payroll payment. Ensuring that staff on-boarding process is carried out effectively and efficiently. There are controls in place to mitigate the risks identified during the review.	ORAC	3 years
Purchasing and Supply Chain Management internal audit	Review of key purchases to payables processes, targeted towards higher risk areas that help ensure the integrity of purchasing master data and payment transactions. To assess if the university has appropriate processes to control who it purchases from and follows the established policies and delegations. Also to assess if there are appropriate controls over discretionary expenditure	ORAC	3 years
Treasury Management Review	Review key controls, including delegations of authority, segregation of duties, reporting to senior management and Council	ORAC	3 years
Travel and Entertainment review	Determine whether staff travel and entertainment expenses are appropriate, accurate and comply with, the University's policies and procedures and, Auditor General Guidelines. To ensure travel and entertainment practices across the business is consistent both at the academic and other divisions	ORAC	3 years
Cyber Security – Penetration Testing	Complete penetration testing on the University's Information Systems	ORAC	3 years

Name	Action	Responsible officer	Cycle
Annual Leave Review	Compare annual leave records insurance records to identify potential un-booked annual leave.	ORAC	Annually
Suspicious Transaction Analysis/Data Mining	Perform a review of the University's transactional data using computer assisted auditing techniques	ORAC	Annually
Post transactional review	Monthly post transactional reviews are completed over creditor's Masterfile, journals with segregation of duties risk, approval exceptions and PCards.	ORAC	Monthly
Monthly Management Reporting	Staff reviewing the monthly divisional reports maintain an awareness for fraud	Head of Finance Advisory	Ongoing
Cyber security prevention and detection strategies	The cyber security prevention and detection strategies are completed	Senior Manager IT Assurance & Cyber Security	Ongoing
Fraud Email address and phone	The fraud email address and phone line are monitored	ORAC	Ongoing
Insurance cover	Insurance cover is reviewed and kept up to date	Financial Controller	Ongoing
Corruption Prevention Initiatives Self Assessment	Review the effectiveness of Fraud and Corruption Prevention initiatives (as promoted in publications such as AS8001-2008 Fraud and Corruption Control, Audit Office of NSW - Fraud Control Improvement Kit Feb 2015)	ORAC	Annual
Fraud Register/Internal Reporting	Results of all fraud investigations are reported internally and registered	ORAC	As required