

CAIT Hi - Ed Fraud and Corruption Management Policy and Procedure

1. Purpose

- 1.1. The primary purpose of this policy is to provide a clear and structured framework for identifying, preventing, and managing risks related to fraud and corruption within Central Australian Institute of Technology Higher Education (CAIT Hi-Ed). By setting clear expectations and procedures, the policy aims to protect the institution's people, resources, and reputation.
- 1.2. This policy affirms CAIT Hi-Ed's commitment to maintaining a culture of transparency, ethical behaviour, and accountability. It reinforces that fraud and corruption in any form are unacceptable and will be addressed with appropriate action.
- 1.3. Through this policy, CAIT Hi-Ed promotes vigilance, encourages the reporting of suspicious activities, and ensures that all allegations are managed fairly, confidentially, and in accordance with legal and institutional standards.

2. Scope

- 2.1. This policy applies to all individuals involved with or acting on behalf of CAIT Hi-Ed, irrespective of their position, seniority, or mode of engagement. This includes full-time, part-time, and casual staff; academic and professional employees; members of executive management; contractors and sub-contractors; consultants; academics; and students.
- 2.2. In so far as both practicable and necessary, this policy shall apply to entities involved in partnerships, and collaborative arrangements, and other third-party relationships where activities impact or represent CAIT Hi-Ed. The institution expects all associated parties to uphold the highest standards of honesty and integrity, consistent with the principles outlined in this policy.
- 2.3. All forms of fraud and corruption, whether internal or external - fall within the scope of this policy. This includes, but is not limited to, theft, embezzlement, bribery, unauthorised use of institutional resources, manipulation of records or data, and the misuse of authority or position for personal or other undue advantage.

3. Policy Statement

- 3.1. CAIT Hi-Ed is committed to fostering a culture that upholds the principles of transparency, accountability, and integrity in all of its operations. These values are fundamental to the institution's reputation, its relationships with stakeholders, and the trust placed in it by students, staff, and the wider community.
- 3.2. Fraud and corruption, in any form, are strictly prohibited under CAIT Hi-Ed's ethical and professional standards. Such conduct undermines the integrity of the institution and compromises its ability to deliver on its mission. The institution requires all individuals associated with it to act with honesty, fairness, and in the best interests of CAIT Hi-Ed at all times.
- 3.3. Where allegations of fraud or corruption arise, the institution will respond promptly and decisively. All reported incidents will be assessed and, where necessary, formally investigated in accordance with this policy. Individuals found to have engaged in fraudulent or corrupt conduct will be subject to disciplinary action, which may include termination of employment or engagement, expulsion, or referral to law enforcement or regulatory authorities.
- 3.4. This strong stance is not only about enforcing rules but also about setting clear expectations and empowering all members of the CAIT Hi-Ed community to speak up without fear. The policy provides protections for those who report concerns in good faith and encourages collective responsibility in preventing and addressing misconduct.

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4. Principles

- 4.1. CAIT Hi-Ed adopts a clear and uncompromising stance of zero tolerance towards all forms of fraud and corruption. This means that any act of dishonest or unethical conduct—regardless of its scale or intent—will be treated with the utmost seriousness and addressed through appropriate disciplinary and legal channels. The institution is committed to fostering a culture where ethical behaviour is expected and upheld by all members of the community.
- 4.2. All reported allegations of suspected fraud or corruption will be thoroughly assessed and, where appropriate, investigated in a timely, fair, and confidential manner. Investigations will follow principles of natural justice and procedural fairness, ensuring that the rights of all parties involved are respected throughout the process.
- 4.3. Every employee, contractor, and affiliate of CAIT Hi-Ed shares a personal and professional responsibility to conduct themselves ethically and to report any suspected wrongdoing. The institution relies on the vigilance and integrity of its people to help detect and prevent misconduct. Individuals are encouraged to report concerns without delay, using the reporting channels outlined in this policy.
- 4.4. To support and encourage reporting, CAIT Hi-Ed will ensure strong protections for whistle-blowers in accordance with relevant CAIT policy and procedures. The institution will take all reasonable steps to preserve the confidentiality of reports and safeguard the identity and wellbeing of those who disclose wrongdoing.

5. Procedure

5.1. Risk Assessment and Prevention

- 5.1.1. At a strategic level, CAIT Hi-Ed's risk management framework is overseen by the institution's Finance, Audit and Risk Management Committee (FARMC), which is responsible for approving risk management policies, procedures, tools, and resources. The CEO holds ultimate responsibility for implementing this framework across the organisation.
- 5.1.2. CAIT Hi-Ed is committed to proactively identifying and addressing potential vulnerabilities that may give rise to fraud or corruption. A structured and strategic approach to risk management is critical to safeguarding the institution's operations, finances, reputation, and stakeholders.
- 5.1.3. The institution will conduct fraud and corruption risk assessments at least every two years, or more frequently where significant organisational changes or incidents occur. These assessments will evaluate internal processes, systems, and business functions to identify areas most susceptible to unethical conduct or exploitation. Risk assessments will involve collaboration between risk management personnel, department heads, and internal auditors, with findings formally documented and reviewed by executive leadership.
- 5.1.4. To reduce identified risks, CAIT Hi-Ed will implement and maintain robust internal controls. This includes the clear allocation of responsibilities, segregation of duties in financial and administrative processes, authorisation limits, regular reconciliations, and independent oversight. These controls are designed to prevent opportunities for fraudulent or corrupt activity and to promptly detect any irregularities.
- 5.1.5. Furthermore, the institution recognises the importance of awareness and education. Regular training sessions on fraud and corruption prevention will be delivered to staff, with tailored programs available for individuals in high-risk roles. These sessions will cover definitions, risk indicators, reporting mechanisms, ethical obligations, and real-case examples to reinforce practical understanding and vigilance.

5.2. Detection

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- 5.2.1. Detecting fraud and corruption effectively requires both a proactive mindset and the strategic use of tools and processes. CAIT Hi-Ed is committed to fostering an environment where early identification of misconduct is supported by both cultural and technical mechanisms.
- 5.2.2. The institution actively encourages vigilance among all staff, students, contractors, and stakeholders. Individuals are expected to remain alert to unusual behaviour, irregular transactions, or other warning signs that may indicate fraudulent or corrupt conduct. This cultural expectation is reinforced through training, clear policies, and leadership commitment to ethical practice.
- 5.2.3. In addition to awareness, CAIT Hi-Ed will make use of audit functions and data analytics tools to support detection efforts. Internal audits will include fraud risk assessments and targeted reviews of high-risk areas. Analytical tools may be used to monitor financial transactions, identify trends or anomalies, and detect unusual patterns that warrant further investigation. These tools enhance the ability to uncover issues that may not be visible through routine oversight.
- 5.2.4. To support early detection and enable safe disclosure, the institution will maintain anonymous and confidential reporting mechanisms. Individuals who suspect fraudulent or corrupt activity may report their concerns through secure, non-retaliatory channels, such as a confidential email address, web-based reporting portal, or dedicated hotline. These avenues ensure that those with genuine concerns can raise them without fear of reprisal, and that such concerns are directed to the appropriate authority for action.

5.3. Reporting

- 5.3.1. CAIT Hi-Ed recognises that the timely and transparent reporting of suspected fraud and corruption is vital to an effective response and to preserving the integrity of the institution. Clear and accessible reporting mechanisms encourage accountability and help ensure issues are addressed before they escalate.
- 5.3.2. Board members, all staff, students, consultants, and affiliates are required to report suspected instances of fraud or corruption as soon as they become aware of them. Reports may be made directly to the Chief Risk Officer, who is responsible for coordinating internal investigations and ensuring appropriate action is taken. Where individuals prefer to remain anonymous, they are encouraged to use the institution's designated confidential reporting channels.
- 5.3.3. To facilitate ease and confidence in reporting, CAIT Hi-Ed offers multiple avenues through which concerns can be raised. These include submitting reports via a secure online portal, dedicated email address, confidential hotline, or by reporting directly in person to a designated officer. Contact details for these channels will be made available and promoted across campus and through staff and student handbooks.
- 5.3.4. All reports will be handled professionally, discreetly, and in accordance with the principles of procedural fairness. The institution will ensure that individuals who report suspected misconduct in good faith are protected from retaliation and that their concerns are treated seriously and investigated appropriately.

5.4. Investigation

- 5.4.1. Once a report of suspected fraud or corruption is received, CAIT Hi-Ed is committed to conducting a thorough, impartial, and timely investigation. The objective of each investigation is to determine the facts of the matter, assess the extent of any wrongdoing, and recommend appropriate corrective or disciplinary action.
- 5.4.2. Upon receipt of a report, the Chief Risk Officer (or delegate) will conduct a preliminary review to assess the nature, credibility, and seriousness of the allegation. If the matter warrants further examination, a formal investigation will be initiated. Depending on the complexity or sensitivity of

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the case, the investigation may be led internally or referred to an external party with the necessary expertise and independence.

- 5.4.3. Investigations will be conducted in line with the principles of procedural fairness and natural justice. This includes giving individuals the opportunity to respond to any allegations made against them and ensuring decisions are made based on objective evidence. Throughout the process, confidentiality will be maintained to the greatest extent possible to protect the rights and reputations of all parties involved.
- 5.4.4. The findings of the investigation will be documented in a written report, which may include recommendations for disciplinary action, system improvements, or referral to external authorities. The Chief Risk Officer will provide this report to the CEO, who will in turn report to the Board. Outcomes will be communicated to relevant stakeholders in accordance with legal and institutional requirements, while also safeguarding confidentiality and privacy.

5.5. Disciplinary and Legal Action

- 5.5.1. CAIT Hi-Ed takes any substantiated instance of fraud or corruption seriously and will respond decisively to uphold the integrity of the institution. Where an investigation confirms that fraudulent or corrupt conduct has occurred, appropriate disciplinary or legal action will be taken in accordance with institutional policies, employment agreements, and applicable legislation.
- 5.5.2. Disciplinary action may include formal warnings, suspension, demotion, or termination of employment or engagement, depending on the severity and nature of the misconduct. For students, disciplinary measures may involve academic penalties, suspension, or expulsion. Where conduct breaches professional or ethical standards, notification may also be made to relevant regulatory or accrediting bodies.
- 5.5.3. In cases involving potential criminal activity—such as theft, bribery, or misuse of public funds—CAIT Hi-Ed will consider referring the matter to law enforcement or other external authorities. The institution will fully cooperate with official investigations and take necessary steps to preserve evidence and support prosecution where appropriate.
- 5.5.4. In addition to disciplinary and legal consequences, CAIT Hi-Ed will pursue avenues to recover financial or reputational losses incurred as a result of fraudulent or corrupt activity. This may involve civil action, restitution agreements, or insurance claims, depending on the circumstances.
- 5.5.5. These actions reinforce the institution's zero-tolerance approach and demonstrate its commitment to deterring misconduct and protecting the interests of the CAIT Hi-Ed community.

6. Roles and Responsibilities

6.1. Governing Board

- Provide strategic oversight of fraud and corruption risks.
- Ensure that management has implemented effective systems of internal control and risk mitigation.
- Review serious incidents and outcomes of investigations.
- Approve and monitor this policy as part of institutional governance.

6.2. Chief Executive Officer (CEO)

- Demonstrate leadership in promoting an ethical organisational culture.
- Ensure resources are allocated to support the prevention and management of fraud and corruption.
- Oversee the implementation of recommendations arising from investigations.

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- Ensure reporting to the Board is timely and accurate.

6.3. Chief Risk Officer (CRO)

- Act as the primary contact for reporting suspected fraud or corruption.
- Oversee risk assessments and manage investigations into reported misconduct.
- Maintain records of incidents, findings, and outcomes.
- Ensure continuous review and improvement of fraud prevention frameworks.
- Report to the CEO and Board on fraud-related matters.

6.4. Managers and Supervisors

- Promote a workplace culture of integrity and ethical conduct within their teams.
- Implement and monitor internal controls to reduce exposure to fraud and corruption risks.
- Support training and awareness initiatives.
- Ensure any suspected misconduct is reported promptly to the CRO.

6.5. Staff Members, Contractors, and Volunteers

- Act with honesty, fairness, and transparency in all dealings on behalf of CAIT Hi-Ed.
- Comply with this policy and all relevant procedures.
- Remain vigilant and report any suspicions or incidents of fraud or corruption.
- Participate in training and maintain awareness of institutional expectations.

6.6. Students

- Uphold ethical conduct and act in accordance with student codes of behaviour.
- Report any suspected misconduct through the appropriate channels.
- Engage in academic and non-academic activities with integrity and respect for institutional values.

6.7. Internal Audit (where applicable)

- Undertake periodic audits of systems and processes to identify and assess fraud risks.
- Recommend improvements to strengthen controls and prevent misconduct.
- Collaborate with the CRO in reviewing high-risk areas.

6.8. External Investigators and Legal Advisors

- Assist in conducting independent investigations when required.
- Provide legal advice on disciplinary or regulatory matters.
- Support recovery of losses or legal proceedings as appropriate.

7. Authority and Compliance

File Number	HEP105
Status	Current
Approval Authority	Academic Board.

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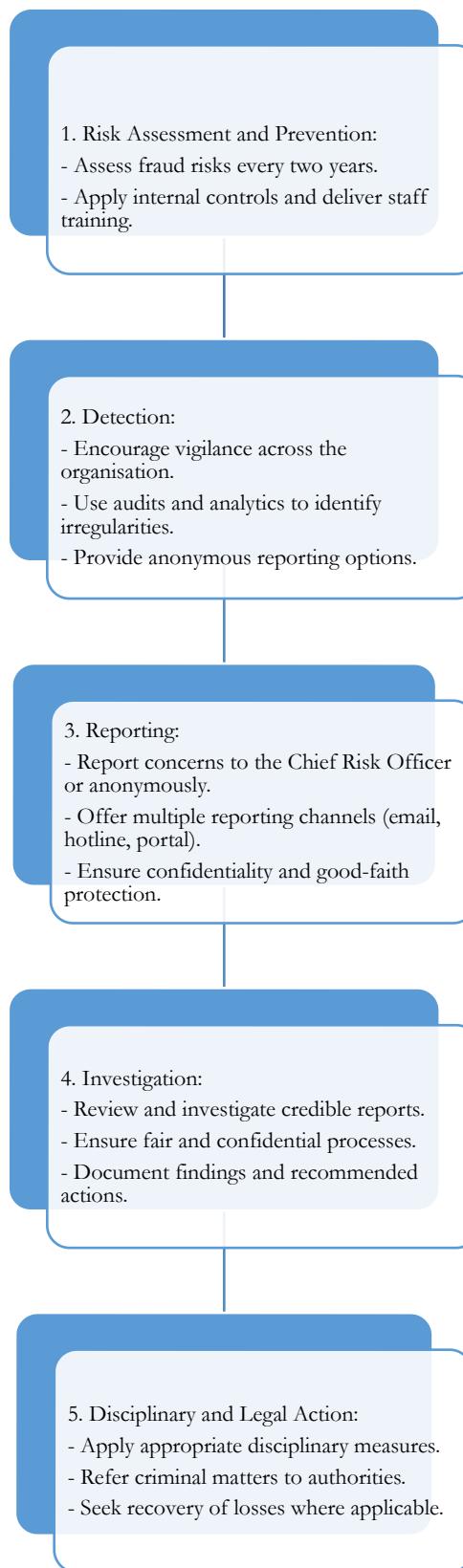
Legislative Compliance	<ul style="list-style-type: none"> • Corporations Act 2001 (Cth) • Crimes Act 1958 (VIC) • Australian Charities and Not-for-profits Commission Act 2012 (Cth) • Public Interest Disclosure Act 2013 (Cth) • Privacy Act 1988 (Cth) • Australian Consumer Law (Schedule 2 of the Competition and Consumer Act 2010) • Fair Work Act 2009 (Cth) • Higher Education Standards Framework (Threshold Standards) 2021 • Tertiary Education Quality and Standards Agency Act 2011 (Cth) • Audit Act 1994 (VIC) (if applicable) • Independent Broad-based Anti-corruption Commission Act 2011 (VIC) • Criminal Code Act 1995 (Cth)
Supporting Documents	<ul style="list-style-type: none"> • CAIT Hi-Ed Fraud and Corruption Incident Report Form • CAIT Hi-Ed Whistleblower Disclosure Form • CAIT Hi-Ed Investigation Outcome Report Template • CAIT Hi-Ed Conflict of Interest Declaration Form • CAIT Hi-Ed Fraud and Corruption Risk Assessment Guidelines • CAIT Hi-Ed Investigation Guidelines and Protocols • CAIT Hi-Ed Whistleblower Reporting and Protection Guidelines • CAIT Hi-Ed Fraud and Corruption Prevention Framework • CAIT Hi-Ed Risk Management Framework
Related Documents	<ul style="list-style-type: none"> • CAIT Hi-Ed Risk Management Policy and Procedure • CAIT Hi-Ed Student Code of Conduct • CAIT Hi-Ed Staff Code of Conduct • CAIT Hi-Ed Grievance and Appeals Policy and Procedure • CAIT Hi-Ed Privacy Policy and Procedure
Higher Education Standards Framework (Threshold Standards) 2021	<ul style="list-style-type: none"> • Standard 6.1; ss 1 – 4 • Standard 6.1; ss 1 - 3 • Standard 6.3; ss 1 & 3 • Standard 7.1; ss 1

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	<ul style="list-style-type: none"> • Standard 7.2; ss 2 • Standard 7.3; ss 1 - 2
Education Services for Overseas Students (ESOS Act) and National Code of Practice for Providers of Education and Training to Overseas Students 2018	<ul style="list-style-type: none"> • Standard 6; ss 9 • Standard 8; ss 1 - 3 • Standard 10; ss 1 - 2 • Standard 11; ss 3 • Standard 12; ss 1 • Standard 13; ss 1 - 2
Responsible Officer	Academic Dean.
Responsible Executive	CEO.
Enquiries Contact	Academic Dean.
Effective Date	
Expiry Date	Not applicable
Next Review	3 Years from the effective date

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8. Appendix 1: WIL and Placement Procedure Flow Chart



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9. Review Schedule

This policy will be reviewed by the Governing Board every three years.

Version History			
Version No	Approved by	Approval Date	Revision Notes
1.0	Governing Board	1/8/2025	