

Fraud and Corruption Response Plan

The University may be alerted to suspicions of fraud and corruption by a number of means including the following:

- a. protected disclosures procedures
- b. internal or external audits
- c. normal internal controls, including the University's [Fraud and Corruption Policy](#).

However suspicion is raised, the following process will apply:

1. An internal authority¹ to whom a suspicion of fraud or corruption is reported will convene a meeting of a Fraud and Corruption Response Group (FCRG) to decide on the initial response. This group does not have a fixed constitution; the internal authority will determine the membership and will either chair the group or appoint someone else to chair it, depending on the circumstances.
2. The internal authority will report any cases of suspected fraud or corruption to the Vice-Chancellor (unless the internal authority is the Vice-Chancellor), the chair of the University's Risk Management Committee, and the University's internal and external auditors at the outset of an investigation.
3. The FCRG will decide on the action to be taken based on an assessment of the circumstances of the case. Normally the FCRG will itself undertake an internal investigation. However, if warranted by the scale or seriousness of the matter the University's internal auditors or external experts may be asked to assist with the investigation, or to undertake a special investigation and report back to the FCRG.
4. If, in the opinion of the FCRG, a report of a suspicion is either frivolous, vexatious or trivial, it may decide not to undertake an investigation.
5. Consistent with the University's [Protected Disclosures Policy](#), every effort will be made to complete an investigation of suspected fraud or corruption within 20 working days.

Communication

6. Where the FCRG initiates an investigation, it will establish and follow a communication plan, which will include details of when relevant parties will be informed about the matter at relevant stages.

Police notification

7. As soon as it becomes evident to the FCRG that fraud or corruption may have taken place the police will be notified and provided with all available evidence.

Prevention and recovery of losses

8. If an initial investigation provides reasonable grounds for suspecting a person of fraud or corruption, and if the case involves the theft of money or property, the FCRG will take steps to prevent further loss. The FCRG will also take steps to prevent the removal or destruction of any potential evidence.
9. Recovering losses is a major objective of any investigation of fraud or corruption, and the amount of any loss will be quantified insofar as this is possible. Recovery of losses will generally be sought in all cases.

¹ In this plan, an internal authority means:

- The Chancellor
- The Vice-Chancellor
- The In-House Solicitor

10. Even if losses are recovered in full, cases of fraud or corruption will still be notified to the police.

Conduct of investigations

11. The internal authority and the FCRG will ensure that the identity of any parties to a suspected case of fraud or corruption is protected as far as practicable until the outcome of an investigation is known.
12. As required under the [Protected Disclosures Act 2000](#), the internal authority and the FCRG will also ensure that any investigation is carried out in a manner consistent with the principles of natural justice.

Authority of the FCRG

13. Members of the FCRG will, within the provisions of the [Privacy Act 1993](#), have free and unrestricted access to any University information and facilities necessary for an investigation.

Reporting to auditors

14. Findings of any investigation of fraud or corruption will be reported to the University's internal and external auditors.

Disciplinary action against staff

15. Whether or not a case of fraud or corruption by a staff member results in a police prosecution, the University will take disciplinary action under the Staff Code of Conduct.

Disciplinary action against students

16. Whether or not a case of fraud or corruption by a student results in a police prosecution, the University will take disciplinary action under the Student Discipline Regulations.

Future references for staff disciplined and prosecuted for fraud and corruption

17. Where a staff member is found guilty of fraud or corruption, all details of the investigation will be recorded on the staff member's Human Resources file and references should not be given.

Media issues

18. Any communications with the media regarding cases or suspicions of fraud or corruption are the responsibility of the Assistant Vice-Chancellor, Communications, Marketing and Engagement on the advice of the Chair of the FCRG.

Support for staff affected by investigations

19. Any staff member affected by an investigation of fraud or corruption will be advised of counselling services available through the University's [Employee Assistance Programme](#).