



UOW Internal Audit

CORRUPTION PREVENTION POLICY

Date approved	15 July 2003	Date Policy will take effect	Immediately	Date of Next Review	20 June 2005
Approved by	Administrative Committee				
Custodian title & e-mail address	Manager, Internal Audit uowia-email@uow.edu.au				
Author					
Responsible Faculty/ Division & Unit	Internal Audit, Vice Chancellor's Unit				
Supporting documents, procedures & forms of this policy	Close Personal Relationships Guidelines Grievance Investigation Procedures General Staff Misconduct Guidelines				
References & Legislation	Independent Commission Against Corruption Act, 1988 (NSW) UOW Code of Conduct – Staff Conflicts of Interest Policy Secondary Employment Policy Client Service and Complaints Handling Policy Grievance Policy				
Audience	Public – accessible to anyone				
Expiry date of Policy	Not applicable				

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1 Purpose of Policy

1. The purpose of this policy is to provide the University with an overarching framework upon which to build a corruption resistant culture.
2. The University is committed to high ethical standards and the principles of public duty. The University's Guiding Principles, as stated in the Strategic Plan, include commitments to:
 - a. high ethical standards including accuracy, honesty, cooperation, tolerance, and acceptance of obligations as well as rights; and
 - b. accountability to students, the University community, the public and governments.
3. Unethical behaviour can cause damage to the University's reputation and image. Corruption prevention strategies demonstrate 'due care and diligence' and assist the University in achieving its objectives.

2 Definitions

Word/Term	Definition (with examples if required)
Corrupt conduct	<p>Corrupt conduct is where a staff member:</p> <ul style="list-style-type: none">• Adversely affect the honest impartial exercise of University function;• Is dishonest or partial in the exercise of official functions, eg. awarding a purchase contract to a friend or relative;• Breaches standards of honesty or public trust by activities that use University facilities inappropriately; and/or• Misuses information or material for the gain.

3 Application & Scope

1. The complex operating environment of the University and increasing regulatory requirements means that the risk of fraud and corruption is ever present. The following are some of the factors that add to this risk:
 - a. increased technology, complexity and competition;
 - b. greater need to allocate scarce resources;
 - c. tighter timeframes and deadlines;
 - d. changes in government funding; and
 - e. ventures into new markets and areas of operation

4 Policy Principles

1. The University has adopted a three faceted strategy to building a corruption resistant culture. The groupings provide a framework for an overall strategy focussed on reinforcing a corruption resistant culture and minimising opportunities for corrupt behaviour.
 - 1.1. Increase awareness of University Guiding Principles of high ethical standards including accuracy, honesty, and accountability expected of members of the University community;
 - 1.2. Minimise corruption by promotion, development and implementation of appropriate policies, procedures mechanisms and controls; and
 - 1.3. Facilitate detection, reporting and investigation of corrupt activities.

5 Roles & Responsibilities

Obligations for Staff

1. All staff members should incorporate this corruption resistance framework into activities for which they are responsible. This includes:
 - a. Incorporating reminders to staff and students of their obligations to ethical conduct and public duties into policies; appointment letters, guidelines; training; and student and/or staff communications;
 - b. Implementing risk management practices and procedures designed to minimise the likelihood of corrupt activities such as: regular monitoring of activities; reporting systems; random data checks; segregation of duties; adequate supervision; record keeping; and documentation;
 - c. Facilitation of detection of corrupt conduct by:
 - i. implementation of controls such as those referred to above;
 - ii. implementation of mechanisms designed to facilitate the reporting of suspected or known instances of corruption in the University;
 - iii. appropriate reporting or investigation of all instances of suspected or known instances of fraud or corruption.

Obligations for Manager, Internal Audit

2. Minimisation of corruption and development of a corruption resistance culture is an obligation of all staff members of the University. Progress will be monitored by the Manager, Internal Audit.

6 Version Control and Change History

Version Control	Date Effective	Approved By	Amendment
1	15 July 2003	Administrative Committee	First Version
2	6 May 2009	Vice Principal (Administration)	Migrated to UOW Policy Template as per Policy Directory Refresh