



# Fraud & Corruption Policy

Endorsed by School Council: March 2018

## Rationale:

To prevent, detect and respond to fraud and corruption within New Gisborne Primary School.

## Aims:

- To provide a clear statement to employees and volunteers that fraudulent, corrupt or improper conduct is not acceptable and will not be tolerated
- To ensure that employees, management and volunteers are aware of their responsibilities for establishing controls and protocols for the prevention and detection of fraudulent conduct
- To ensure that employees, management and volunteers are aware of their responsibilities for reporting suspicions of fraud and how such reports should be made
- To build a culture that supports employees and volunteers to report conduct they suspect may be fraudulent, corrupt or improper
- To ensure that appropriate action is taken if fraudulent conduct is detected.

## Guidelines:

- The Department of Education and Training (DET), and related statutory authorities, have a **zero tolerance** approach to fraudulent and corrupt conduct
- It is a mandatory requirement that all cases of suspected or actual fraud be reported and action taken
- All employees and volunteers have an obligation to report all instances of suspected fraud and corrupt or improper conduct.
- Suspected fraud and corruption matters can be reported as a general complaint or as a protected disclosure.
- Privacy and confidentiality should be key considerations and all cases should be treated on a need-to-know basis. Rumours, speculations and innuendo should be avoided to protect reputations. It is also important to avoid alerting any person who may be suspected of fraud or corruption, or who is under investigation.
- Staff and management should be aware that strong penalties exist under the *Protected Disclosure Act 2012* for any breach of confidentiality with regard to a protected disclosure.

## Definitions:

- **Fraud** is defined as dishonest activity causing actual or potential loss to DET (including theft of monies or other property) and where deception is used. This also includes deliberate falsification, concealment, destruction or use of (or intention to use) falsified documentation and the improper use of information or position for personal financial benefit.
- **Corrupt conduct** is where a manager, employee, contractor or volunteer dishonestly uses and abuses their position to achieve some personal gain or advantage for him or herself or for another person or entity which is contrary to the interests of DET
- **Improper conduct** includes corrupt conduct; substantial mismanagement or misuse of public resources; conduct involving substantial risk to public health and safety or the environment which, if proven, may constitute a criminal offence or reasonable grounds for termination.
- **Protected Disclosure:** The Protected Disclosure Act 2012 (Vic) ensures that people who report improper conduct and corruption in the Victorian public sector (whistleblowers) can do so in the

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knowledge that they will be protected. Protections include keeping the identity of the person reporting improper conduct confidential and protecting them from reprisals including bullying, harassment or legal action.

**Implementation:**

- If an employee or volunteer suspects fraud, corrupt conduct or improper conduct is occurring involving management, employees, contractors, volunteers or other external parties such as suppliers, he/she must report the matter to:
  - the Principal or Business Manager, or
  - the Executive Director, Integrity and Assurance Division on (03) 9651 3650 or email [kaplan.jonathan.e@edumail.vic.gov.au](mailto:kaplan.jonathan.e@edumail.vic.gov.au)
  - The Manager, Fraud and Corruption Control (03) 9637 2353 or email [hurrell.ashley.k@edumail.vic.gov.au](mailto:hurrell.ashley.k@edumail.vic.gov.au) or [fraud.control@edumail.vic.gov.au](mailto:fraud.control@edumail.vic.gov.au)
  - The Education Speak Up Service  
[https://edugate.eduweb.vic.gov.au/sites/i/pages/production.aspx#/app/content/1942/support\\_and\\_service\\_\(corp\)%252Fintegrity\\_and\\_assurance%252Fraising\\_concerns%252F speak\\_up\\_service](https://edugate.eduweb.vic.gov.au/sites/i/pages/production.aspx#/app/content/1942/support_and_service_(corp)%252Fintegrity_and_assurance%252Fraising_concerns%252F speak_up_service)
- The person suspecting fraud, corruption or improper conduct may report to the Principal or Business Manager, unless they are the subject of the report, in which case the person should use the other options.
- Whoever receives the initial report, must refer the report on to the Executive Director, Integrity and Assurance Division. The Executive Director will decide the next course of action. School Principals, and/or any staff, are not to initiate or conduct any investigations.

**Evaluation:**

This policy will be reviewed as part of the school's three year review process or in response to changes in relevant policies, external Standards, Guidelines and Legislation

**Approval Body:** School Council

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