



IHM[®]
Institute of Health and Management

Fraud and Corruption Prevention and Control Policy

SECTION 1

Purpose

1. The purpose of this Policy is to:
 - a. Promote a culture of honesty, integrity and professionalism;
 - b. State that the Institute of Health & Management (IHM) does not tolerate fraud and corruption;
 - c. Establish controls and procedures to prevent and detect fraudulent and corrupt activities;
 - d. Provide guidance about what constitutes fraud and corruption to assist those working for or on behalf of IHM to recognise and deal appropriately with this conduct;
 - e. Mandate the reporting of any fraud or corrupt conduct; and
 - f. Outline the procedures to be followed upon detection of fraud and corruption, including the consequences for people who engage in this conduct.

Scope

2. This Policy concerns IHM's approach to preventing, detecting, investigating and managing matters of corrupt and improper conduct and applies to all IHM students, staff and associates. Research and academic misconduct by IHM staff and students will be dealt with under the Research Management Policy and Procedure, the Academic Honesty and Integrity Policy and Procedure, and the Student Misconduct Policy and Procedure.

Definitions

3. **Associates:** contractors, consultants, volunteers, visiting appointees and visitors to IHM
4. **Corruption:** (from the Independent Broad-based Anti-Corruption Commission Act 2011 (Vic) dishonest activity in which an IHM staff member or student acts contrary to the interests of IHM, knowingly or recklessly abuses their position of trust, and adversely affects IHM's effective and honest performance or intends to do so in order to achieve personal gain or advantage for him or herself or for another person or entity. Corruption can also involve corrupt conduct by the entity, or a person purporting to act on behalf of and in the interests of the entity, in order to secure some form of improper advantage for the entity either directly or indirectly. Corruption does not occur unintentionally, or through mistaken actions.
5. **Fraud:** the act of dishonestly obtaining a material benefit by deception or other means. Fraud can include, for example, theft, deliberate falsification, concealment or misuse of documentation, or false representation. IHM considers fraud an act of serious misconduct and grounds for termination of employment, in accordance with the relevant workplace agreements.
6. **Staff:** a member of the academic staff, professional staff, management or senior executive.

7. **Student:** (i) a person enrolled in a course or unit in IHM; (ii) a student of another higher education institution to whom IHM grants rights of access to IHM premises and facilities; (iii) a candidate for an award of IHM whose work has been examined or assessed but on whom the award has not been conferred; (iv) a person who is on leave of absence from or who has deferred enrolment in a unit or course of IHM.

Suite Documents

8. Fraud and Corruption Prevention and Control Procedure

SECTION 2

Policy

Ethical environment

9. IHM is committed to establishing and maintaining an organisational culture that upholds the highest standards of legal, ethical and moral behaviour in its stewardship of public and private funds for the pursuit of its objects in teaching and research.
10. IHM requires all individuals acting on its behalf to conduct business honestly, ethically and professionally and does not tolerate fraud and corruption and any form of dishonesty in its transactions. This requires individuals to not only be responsible for their own behaviour but to support others in adopting ethical practices.

Prevention

11. IHM is committed to preventing fraud and corruption within IHM. To this end, IHM will put in place appropriate mechanisms for fraud and corruption risk management, including policies and procedures, risk assessment, internal controls, investigation, reporting, education and independent auditing to reduce the incidence of fraud and corruption and regularly evaluate these for effectiveness.
12. IHM recognises that the risk of fraud and corruption can arise in various contexts and will put in place measures proportionate to the risks it faces in order that IHM staff, students and associates are aware and understand the relevant policies and procedures for the prevention, detection and elimination of fraud and corruption.

Response

13. Fraud and corruption against IHM may constitute a serious offence under Commonwealth and State law and IHM will fully investigate any allegations of fraud and corruption as soon as the allegation is notified.
14. A major objective in any fraud investigation will be the punishment of the perpetrators, to act as a deterrent to others. IHM will follow disciplinary procedures (Performance Management Policy and Procedure and Student Misconduct Policy and Procedure) against

any member of staff or student who has committed fraud and corruption. IHM will normally involve the police and other relevant government agencies and pursue the prosecution of any such individual. Associates may have commensurate action taken against them, which may include termination or non-renewal of their appointment or contract. IHM may also initiate civil action to recover losses.

15. Investigation of matters by IHM will follow principles of natural justice. IHM will appoint individual(s) who are impartial and who possess appropriate skill and expertise as part of the investigation process.
16. All suspected incidents of fraud and corruption will be recorded in order to identify trends and prevent recurrence.

Reporting

17. Staff and associates are encouraged to promote a culture of integrity, accountability and good management within IHM by reporting suspected incidents of corrupt and improper conduct at the earliest possible stage to the Chief Financial Officer (or if the matter involves the Chief Financial Officer to the Chief Executive Officer) or Chair of the Audit and Risk Committee. Reports are to be made on the basis of honest and reasonable beliefs and/or evidence.
18. Provided that an allegation of corrupt and improper conduct is made in good faith, on the basis of honest belief, lawfully and without malice and in the public interest, persons or organisations who have dealings with IHM are encouraged to come forward and report known and suspected incidents.
19. IHM may have an obligation to report incidents of suspected or actual fraud to IHM's Audit and Risk Committee and externally to the Tertiary Education Quality and Standards Agency and the Police.
20. IHM does not tolerate vexatious and frivolous complaints and may initiate disciplinary proceedings where complaints of this nature are found.

Responsibility

21. The Chief Financial Officer is responsible for the management of IHM's internal control framework that covers fraud and corruption prevention and control.
22. The Fraud and Corruption Prevention and Control Procedure documents how to comply with this Policy.

SECTION 3

Associated Information

Related Internal Documents	<p>Fraud and Corruption Prevention and Control Procedure</p> <p>Academic Honesty and Integrity Policy and Procedure</p> <p>Performance Management Policy and Procedure</p> <p>Research Management Policy and Procedure</p> <p>Risk Management and Quality Assurance Policy and Procedure</p> <p>Student Misconduct Policy and Procedure</p>
Related Legislation, Standards and Codes	<p>Tertiary Education and Quality Standards Agency Act 2011</p> <p>Higher Education Standards Framework (Threshold Standards) 2015 Domain 6</p>
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