

Fraud and Corruption Control Policy

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1. Purpose

- 1.1. The *Public Governance, Performance and Accountability Act 2013* (PGPA Act) requires the Australian Film, Television and Radio School (AFTRS) to meet high standards of governance, performance and accountability, and to use and manage public resources properly.
- 1.2. Section 10 of the *Public Governance, Performance and Accountability Rule 2014* (PGPA Rule) establishes a minimum standard applying to AFTRS' Council for managing the risk and incidents of fraud and corruption.
- 1.3. This Policy:
 - supports Council to effectively discharge its responsibilities under the PGPA Act and PGPA Rule relating to fraud and corruption;
 - sets out AFTRS' policy position on fraud and corruption;
 - describes the framework that AFTRS adopts to minimise the potential and consequences of fraud and corruption; and
 - was developed in the context of AFTRS' overarching risk management framework.
- 1.4. The Policy has the following objectives:
 - to ensure that AFTRS' public resources, including money, information and property, are used fairly, equitably, and for their intended purposes; and
 - to protect the integrity and good reputation of AFTRS and the Commonwealth.
- 1.5. This Policy should be read in conjunction with the *Fraud and Corruption Control Plan*, which describes how this Policy is implemented.

2. Scope

- 2.1. This Policy primarily applies to all AFTRS' employees, including casual employees, contractors and volunteers. The Policy also applies to students and the public to the extent they are implicated in fraudulent or corrupt conduct relating to AFTRS.
- 2.2. The Policy also allows the public to register concerns, and know that AFTRS may take action against members of the public if they are involved in fraud or corruption against AFTRS.
- 2.3. While staff are covered by this Policy, student fraud and corruption is specifically governed by the *Student Code of Conduct* and other applicable policies and procedures.

3. Policy Statement

General

- 3.1. AFTRS does not tolerate dishonest, fraudulent or corrupt behaviour. It is committed to preventing fraud and corruption, and encouraging an ethical culture in the performance of its business operations.
- 3.2. AFTRS will ensure that due process is followed in relation to investigations of alleged or suspected fraud or corruption.
- 3.3. AFTRS has a number of strategies to prevent, detect and respond to suspected fraudulent or corrupt activity, including integrity frameworks through *Codes of Conduct*, and fraud and corruption control plans, awareness training, and risk assessments. Robust internal controls include appointment screenings, data analysis, management report reviews, as well as clear reporting channels and protection for people who disclose potential fraud or corruption.
- 3.4. AFTRS' employees, contractors and volunteers are expected to be committed to preventing, detecting and responding to instances of actual or suspected fraud or corruption against AFTRS. They are subject to the *Code of Conduct* and are expected to be familiar with this Policy and AFTRS' fraud and corruption control plans. They must cooperate with the implementation of fraud and corruption control strategies, comply with relevant internal controls and cooperate with any investigations.

Fraud and Corruption Control Plan

- 3.5. AFTRS' risk- based *Fraud and Corruption Control Plan* is one element of its fraud and corruption control framework. It addresses the prevention, detection, investigation and reporting of suspected fraud or corruption against AFTRS.
- 3.6. The *Fraud and Corruption Control Plan* is a "living" document, and will be updated whenever required, such as when new or amended legislation is passed or when AFTRS changes its structures or systems.
- 3.7. AFTRS' *Fraud and Corruption Control Plan* will also be reviewed every two years, taking into account:
 - whether the risk assessment methodology remains valid;
 - if new risk assessments should be conducted;
 - any changes in AFTRS' operations and environment;
 - recommendations in the last *Fraud and Corruption Control Plan* that were not implemented; and
 - strategies to manage residual risks identified in the most recent fraud and corruption risk assessment.

4. Responsibilities

Compliance, monitoring and review

- 4.1. All changes to this policy must be reviewed and endorsed by AFTRS' Finance, Audit and Risk Management (FARM) Committee before being presented to Council for approval.
- 4.2. Every AFTRS' *Fraud and Corruption Control Plan* must be reviewed and approved by the FARM Committee.
- 4.3. The FARM Committee must also review reports from the Chief Financial Officer on the implementation of fraud and corruption control strategies, and on any non-trivial incidents of suspected or actual incidents of fraud or corruption, whether or not referred to police.

Reporting

- 4.4. Reporting may be required by the *Fraud and Corruption Control Plan*. No additional reporting is required.

Records management

- 4.5. All records relevant to administering this policy and procedure will be maintained by the Policy and Governance Officer.

5. Definitions

Fraud:	means dishonestly obtaining (including attempting to obtain) a gain or benefit, or causing a loss or risk of loss, by deception or other means.
Corruption:	means any conduct that does or could compromise the integrity, accountability or probity of public administration. This includes: <ul style="list-style-type: none">• any conduct of any person (whether or not they are a staff member of a Commonwealth agency) that adversely affects, or that could adversely affect, either directly or indirectly:<ul style="list-style-type: none">- the honest or impartial exercise of any staff member's powers as a staff member of a Commonwealth agency; or- the honest or impartial performance of any public official's functions or duties as a public official;• any conduct of a staff member of a Commonwealth agency that constitutes or involves a breach of public trust;• any conduct of a staff member of a Commonwealth agency that constitutes, involves or is engaged in for the purpose of abuse of the person's office;• any conduct of a staff member of a Commonwealth agency, or former staff member of a Commonwealth agency, that constitutes or involves the misuse of information or documents acquired in the person's capacity as a staff member of a Commonwealth agency.

6. Related Legislation and Documents

- *Public Governance, Performance and Accountability Act 2013*
- *Public Governance, Performance and Accountability Rule 2014*
- *Commonwealth Fraud and Corruption Policy*
- *AFTRS' Fraud and Corruption Control Plan*

7. Approval and Review Details

Approval and Review	Details
Approval Authority	Council
Responsible Officer	CEO
Contact Officer	Head of Finance
Distribution	Intranet and AFTRS website Staff and Public facing
Next Review Date	01/06/2024

Approval and Amendment History	Details
Original Approval Authority, Date and Details	Council, 26/03/2024 — The policy was reviewed to align with the new <i>Commonwealth Fraud and Corruption Control Framework</i> coming into effect on 1 July 2024. The document includes enhanced definition of Fraud, and Corruption, and also now addresses corruption.
Amendment History and Date	N/A <<DD/MM/YYYY — Amendment detail; DD/MM/YYYY— Amendment detail >> [Include the previous approval authority approval dates and corresponding amendment detail. This section will expand over time. In the case of a brand-new policy doc, insert N/A]
Notes	The Fraud and Corruption Control Policy has been issued with a new PPG and first version numbers as it replaces the Fraud Control Policy.
Minor Amendment Approval and History	N/A <<DD/MM/20YY — Xxxxx>> [Over the life of a policy document, it may require a minor amendment. A minor amendment consists of an administrative edit only made to the document or a change that is not material to the document. The Responsible Officer can approve a minor amendment. Insert the date that the Responsible Officer approved the minor amendment along with the details of the amendment (For example: “01/12/2020 — administrative amendment: update of role titles aligned to restructure”, or insert, if not relevant, N/A [If making a minor amendment, do not amend details in the Original Approval Authority section nor amend the version number, only replace the new minor amendment approval date to the file and in footer]

AFTRS acknowledges its reference to the University of Melbourne’s Guidelines for Drafting Policy (June 2013) in developing this template.