

Purpose and Scope

Murdoch University's Fraud and Corruption Policy represents its commitment to robust fraud risk management and is essential in ensuring that it conducts its operations and achieves its strategic objectives in an environment characterised by integrity, ethics and transparency.

The University is committed to maintaining a positive organisational culture that encourages good behaviour while ensuring that effective fraud and corruption control is an integral part of the University's activities and processes.

This policy applies to all areas and activities of the University, including University controlled entities, the Senate, Senate Committees, employees, students, contractors and anyone undertaking University business or operational activities.

Policy

1. In this policy, the following words have the following meanings:

The University has adopted the definitions of Australian Standard for Fraud and Corruption Control AS 8001:2021 for fraud and corruption.

- 1.1. **Fraud** is defined as dishonest activity causing actual or potential gain or loss to any person or the University including theft of monies or other property by the University's employees or persons external to the University, and/or where deception is used at the time, immediately before or immediately following the activity. This also includes the deliberate falsification, concealment, destruction or use of falsified documentation used or intended for use for a normal business purpose or the improper use of information or position for personal financial benefits.
- 1.2. **Corruption** is defined as dishonest activity in which an employee or contractor of the University acts contrary to the interests of the University and abuses their position of trust in order to achieve personal advantage or advantage for another person or organisation. This can also involve corrupt conduct by the University, or a person purporting to act on behalf of and in the interest of the University, in order to secure some form of improper advantage for the University either directly or indirectly.

As the University is required to report fraud and corruption under the [Corruption, Crime and Misconduct Act 2003 \(WA\)](#) (CCM Act), the definitions of serious and minor misconduct as outlined in the CCM Act are provided below:

- 1.3. **Serious Misconduct** is a conduct by a University staff member who:
 - 1.3.1. acts in a way that constitutes, or could constitute, a disciplinary offence providing reasonable grounds for termination of a person's office or employment.
and
 - 1.3.2. acts corruptly or corruptly fails to act in the course of their duties; or
 - 1.3.3. corruptly takes advantage of their position to obtain a benefit or to cause a detriment to any person; or
 - 1.3.4. acting in the course of their duties or while deliberately creating the appearance of acting in the course of their duties, commits an offence punishable by two or more years imprisonment.
 - 1.4. **Minor Misconduct** is conduct by a University staff member that:
 - 1.4.1. constitutes, or could constitute, a disciplinary offence providing reasonable grounds for termination of a person's office or employment.
and
 - 1.4.2. adversely affects the honest or impartial performance of the functions of University or a staff member, whether or not the staff member was acting in their official capacity at the time of engaging in the conduct; or
 - 1.4.3. involves the performance of functions in a manner that is not honest or impartial; or
 - 1.4.4. involves a breach of the trust placed in the staff member; or
 - 1.5. **Employee** includes all employees on permanent, fixed term or casual employment and honorary appointments.
 - 1.6. **Senior Management** includes members of the University's Senior Leadership Group, Directors, Pro-Vice Chancellors, Deans of Schools, Heads of Institutes and Centres or equivalent positions.
 - 1.7. **University Integrity Officer** refers to the Director, Audit, Risk and Compliance Management.
2. The University requires its employees to follow high standards of integrity and professionalism in performing their duties. Employees are responsible for their own conduct and are also expected to respond appropriately when they become aware of behaviour by others that may involve fraud or corruption.
 3. The University maintains 'zero tolerance' towards fraud and corruption and requires that any case of suspected or actual fraud or corruption is reported in accordance with the appropriate University process as soon as practicable.
 4. The University provides an appropriate process for reporting suspected or actual instances of fraud and corruption. Any person may report a suspected instance

of fraud or corruption in relation to the University to the University's Integrity Officer.

5. Anyone who becomes aware of suspected or actual fraud or corruption at the University is expected to maintain strict confidentiality regarding all information, including the identities of those involved unless disclosure is required by law or necessary for reporting to the University Integrity Officer for investigation purposes. This ensures that ongoing investigations are not compromised.
6. The University adopts a holistic approach to fraud and corruption control as demonstrated by its fraud and corruption control framework, which includes the following:
 - Fraud and Corruption Policy and Procedure
 - Fraud and Corruption Control Plan
 - Public Interest Disclosure Policy and Procedure
 - Conflict of Interest Policy and Procedure

Objectives

The objectives of the Fraud and Corruption Policy are to:

- Promote and support a positive and collaborative working culture based on high standards of integrity, ethics and professionalism.
- Protect the University's assets, interests and reputation through an integrated and systematic approach to prevention, management and reporting of fraud, and corruption.
- Guide staff on the appropriate actions to be taken should they become aware of suspected or actual incidents of fraud or corruption.
- Ensure the University fulfils its notification and reporting duties to the Corruption Crime Commission (CCC) or Public Sector Commission (PSC) under the CCM Act.

Principles of Confidentiality and Natural Justice

Information received by the University in relation to fraud and corruption will be managed appropriately in accordance with the principles of privacy and confidentiality.

Procedural fairness will be maintained in accordance with the principles of natural justice.

Governance

Approval Authority	Senate
Owner	Director Audit, Risk and Compliance Management
Legislation mandating compliance	Corruption Crime and Misconduct Act 2003 (WA) Public Interest Disclosure Act 2003
Category	Management
Related University Legislation and Policy Documents	Fraud and Corruption Procedure Fraud and Corruption Control Plan Conflict of Interest Policy Conflict of Interest Procedure Public Interest Disclosure Policy Public Interest Disclosure Procedure Staff Code of Conduct Communication with the Public Sector Commission and Corruption and Crime Commission Procedure Research Integrity Policy Research Integrity Procedure
Date effective	10/03/2026
Review date	10/03/2029

Approval History

Approved/Amended	Date Approved	Resolution No. (if applicable)
Approved by Senate	10/03/2026	S/05/2026(i)
ARC recommended policy to Senate for approval	16/02/2026	ARC/02/2026(i)
Recommended by ARC for approval	16/02/2026	
Supported by SLT for submission to ARC for Senate Approval	27/01/2026	

Administrative amendments	28/08/2024	
Approved	06/09/2017	S/25/2017
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Approved	29/01/2015	S/06/2015
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Approved	13/03/2013	S/07/2013
Recommended by ARC for approval	6/03/2013	ARMC/6/2013