

FRAUD AND CORRUPTION PREVENTION

Scope: This policy applies to all staff employed by Catholic Education - Diocese of Rockhampton (referred to as CEDR in the document).

1. POLICY STATEMENT

Catholic Education - Diocese of Rockhampton (CEDR) is committed to maintaining a robust culture of integrity and ethical behaviour in which employees are responsible and accountable, behave with honesty and integrity and are able to raise concerns regarding unethical, unlawful or undesirable conduct, without fear of reprisal. CEDR will not tolerate fraud or corruption within any part of the organisation and will impose disciplinary action where necessary.

2. PURPOSE

“The Gospel calls individual Christians to live lives of honesty, integrity and concern for the common good... to create circles of integrity..., networks of solidarity which can expand to embrace and transform society by their prophetic witness.” Pope Francis

Fraud and/or corruption, including bribery, in all forms are behaviours that are contrary to CEDR’s values, mission and culture. CEDR is actively committed to preventing fraud and corrupt conduct throughout the organisation. CEDR has developed this fraud and corruption prevention policy as part of its overall risk management framework.

All CEDR staff must not engage in any fraudulent or corrupt activities or behaviours and are responsible for acting, at all times, in an ethical manner with integrity.

CEDR, in accordance with the ethos and values of the Catholic church, promotes a high standard of integrity and accountability by demonstrating professional behaviour consistent with our role and values, and operating in an environment of openness, probity and accountability in all aspects of our operations.

3. DESCRIPTION

Fraud and/or corruption includes the misappropriation of assets, the manipulation of reporting and the abuse of position for personal gain. For the purposes of this policy:

- **Fraud** is a dishonest and intentional activity committed to secure an unfair or unlawful gain, regardless of whether or not deception is used.
- **Corruption** is a dishonest or intentional activity in which a person on behalf of CEDR acts contrary to the interests of CEDR and abuses their position of trust in order to achieve personal gain or advantage for themselves or someone else.

Examples of **fraud** include, but are not limited to:

- the deliberate falsification or concealment of documentation or information
- the deliberate and unauthorised destruction of documentation or information
- knowingly providing false or misleading documentation or information to CEDR or knowingly using such documentation
- failing to provide documentation or information where there is an obligation to do so
- the improper use of information or position
- false invoicing (i.e. creating a fictitious invoice claiming payment for goods or services not delivered or exaggerating the value of goods delivered or services provided)
- false accounting/accounts payable/accounts receivable fraud (misappropriation or misdirection of remittances received by an entity from a debtor)
- credit card fraud involving the unauthorised use of a credit card (e.g. for personal expenses) or credit card number issued to another person;
- deliberate misstatement of accounting and financial information
- using CEDR intellectual property, information or resources for personal gain
- theft or misuse of CEDR money, property, assets, equipment or facilities
- causing a loss, or avoiding or creating a liability by deception.

Examples of **corruption**, but are not limited to:

- offer, payment, solicitation or receipt of secret commissions/bribes, which may be paid in money or in some other form of value and which may relate to a decision or action by the receiver or generally
- release of confidential information for other than a proper business purpose in exchange for some form of non-financial benefit or advantage accruing to the person releasing the information
- ~~the~~ collusive tendering (act of multiple tenderers for a contract colluding in preparation of their bids)
- payment or solicitation of donations for an improper political purpose, whether made to a political party, member, candidate or research organisations tied to a political party
- conflicts of interest where a staff member is acting in their own self-interest rather than that of CEDR
- nepotism and cronyism
- manipulation of or improper conduct in the procurement process or contract management (e.g. by selectively providing information to some bidders and not to others)
- receipt or making of gifts/entertainment intended to achieve a specific or generic commercial outcome
- deliberately causing, contributing to, or being directly linked to modern slavery (defined broadly as all forms of human trafficking, forced labour and slavery-like practices) which can be closely linked to corruption or fraud
- bribing government officials (locally or in foreign jurisdictions) for any reason, including in order to secure a contract for the supply of goods or services or
- provision of or receipt of private sector to private sector commissions/kick-backs to secure contracts.

4. IMPLEMENTATION ISSUES

1. CEDR will minimise its exposure to the risk of fraud and corruption through adoption of sound financial policies and procedures, internal audit processes, *Delegations Framework*, and staff *Code of Conduct*.
2. In accordance with the staff *Code of Conduct*, people acting for or on behalf of CEDR are responsible for the prevention and detection of fraud and/or corruption and must always act with integrity.



3. CEDR requires all transactions to be conducted at arm's length. Where a perceived or known Conflict of Interest exists, CEDR employees are directed to complete a *Conflict of Interest* declaration, gain approval from their Principal/Leadership Team Member/Director, before the engagement occurs.
4. CEDR staff must report any situations where a Conflict of Interest is suspected and an appropriate declaration is not completed and approved, to their relevant Kindergarten Director, Principal or Leadership Team Member.
5. To minimise fraud and/or corruption risk, all CEDR entities should conduct appropriate risk assessments, implement internal controls as prescribed in appropriate financial guidelines and report concerns or suspicions of fraudulent or corrupt activity immediately.
6. CEDR will promptly investigate all allegations and suspicions of fraud or corruption, including by administrative, disciplinary and criminal processes suitable to the situation.
7. The CEDR ***Fraud and Corruption incident reporting process*** involves:
 - a. any suspected and/or confirmed acts of fraud or corruption should be immediately advised to the relevant CEDR Leadership Team Member who will notify the Diocesan Director Catholic Education (Diocesan Director). Where the allegation relates to a CEDR Leadership Team Member, the notification will be made directly to the Diocesan Director. Where the notification relates to the Diocesan Director, the notification will be made directly to the Bishop of Rockhampton. Where the notification relates to the Bishop of Rockhampton, notification will be made to the Diocesan Director who will escalate accordingly.
 - b. the Catholic Education Office or the Bishop of Rockhampton will investigate, report and escalate as necessary (including to Police).
 - c. all allegations of suspected fraud and/or corruption will be treated in confidence for both the reporter and accused.
8. In all circumstances, where the immediate delegated authority is unavailable, the next level of delegation should be advised.
9. Fraud and/or corruption is regulated by several laws in Queensland, including the Australian Commonwealth and Queensland criminal codes, Corporations legislation, competition and consumer legislation and common law. CEDR staff must also comply with all applicable laws in Australia. If the standard set out in this Policy is higher than the standard prescribed by the applicable law, staff must comply with this Policy.
10. Failure to comply with the staff *Code of Conduct* and this policy may constitute a breach of employment or contractual obligations. Instances where fraud and/or corruption are substantiated will result in disciplinary action including termination of employment. Where necessary, instances of substantiated fraud shall be reported to police and may result in the appropriate civil or criminal action.

4. REFLECTION MATERIAL

CATHOLIC EDUCATION POLICIES AND DOCUMENTS

- [Staff Code of Conduct](#) v5 2023
- *Conflict of Interest Declaration Procedure* v3 2023
- *Catholic Education Risk Management Framework* v3 2021
- *Delegations Framework* v2 2022
- [Whistleblower Protection](#) 2023/14
- [Parent Code of Conduct](#) v2 2017



RESOURCES

- [*Diocesan Modern Slavery Policy*](#) v1 2022
- [Catholic School Parents Queensland](#)