



---

# **FRAUD & CORRUPTION PREVENTION POLICY**

**Prepared by:** Finance  
**Approving Authority:** Council  
**Date Approved:** 17<sup>th</sup> December 2022  
**Date Revised:**  
**Next Review:** December 2024  
**Version Number:** 1

---

# Content

1. Policy Purpose
2. Policy Objective
3. Definitions
4. Policy Principles/Content

## 1. Purpose

This Fraud and Corruption Prevention Policy aims to set out responsibilities of university staff and students of the Fiji National University in regards to observing and upholding zero tolerance position on fraud and corruption.

The Policy will also be a source of information and guidance for those working for the Fiji National University, on how to recognize and deal with fraudulent and corruption related activities.

## 2. Objective

To create an environment which prevents and discourages fraudulent behavior.

## 3. Definitions

Fraud is any intentional act or omission designed to deceive others or dishonestly obtaining a benefit, or causing loss by deception or other means.

Corruption is the abuse of entrusted power for private gain; that is, conduct that involves, or that is engaged in for the purpose of, and the staff members abusing his or her office as a staff member of the university.

Potential examples in the University context include:

- Theft
- Accounting fraud (e.g. False invoices, misappropriation)
- Unlawful use of, or obtaining property equipment, material or service
- Providing false or misleading information to the Fiji National University
- Misuse of university assets, equipment or facilities
- Making or using false, forged or falsified documents
- Wrongfully using university information or intellectual property
- Receiving or giving kickbacks or secret commissions to or from third parties
- Staff making false claims for compensation such as overtime or fictitious travel claims
- Fabrication, falsification of research or scholarly work
- Dishonestly using grant or research funds or sponsorships

## 4. Policy

All staff are expected to abide by all University policies. If a member or staff suspects that an action or event perpetrated either by another staff member of the University or by a third party, that may constitute a potential fraud or irregularity, the suspicion should immediately be reported as per University's Whistleblower protection policy. Breaches of this policy by staff will be subject to disciplinary processes laid out in the Code of Conduct policies and procedures of the University.

## 5. Accountabilities and responsibilities

- 5.1.1. Council: oversees, monitors and receives reports in respect of anti-corruption and fraud matters through its Audit and Risk Committee.
- 5.1.2. The Vice-Chancellor: is accountable for the University's organization-wide approach to anti-corruption and fraud prevention.
- 5.1.3. Heads of Budgetary Units are responsible for:
  - a) ensuring that an adequate system of internal control exists within their areas of responsibility and that the controls operate effectively;



- b) assess type of risks involved with the operations for which they are responsible, and ensure compliance with internal controls;
- c) the detection and prevention of fraud, safeguarding University funds and assets under their control against misuse or misappropriation.

## 6. Reporting Procedures

### 6.1. What should an employee do if he/she suspects fraud and corruption?

- 6.1.1. The reporting line for reporting suspected individuals shall be in line with University Whistleblower Protection Policy, Section 7.0.
- 6.1.2. Should an employee wish to report an alleged incident of fraud and corruption (anonymously or otherwise), he/she may do so through the Whistleblower Protection Policy facility available.

### 6.2. How will allegations of fraud and corruption be dealt with?

- 6.2.1. With regard to issues raised by an employee, student, member of the public or provider of goods and/or services, the action taken will depend on the nature of the concern and the procedures outlined in the University's Whistle-blowers Protection Policy. The matters raised shall be screened and evaluated and may subsequently:
  - be investigated internally; and/or
  - referred to another law enforcement agency

### 6.3. Reporting to the Audit and Risk Committee

- 6.3.1. A summary of all reported cases will be provided to the Audit and Risk Committee on a quarterly basis.
- 6.3.2. Detailed highlights of the cases will be reported to the Audit and Risk Committee:
  - Cases involving Deans/Directors and above
  - Cases that involve an actual or a potential financial loss/ fine/ penalty above 100,000FJD
  - Cases that result in investigation by the Police, FICAC and other law enforcement agencies

## 7. Confidentiality

- 7.1. All information relating to fraud and corruption which has been received and investigated shall be treated confidentially. The progress made with investigations shall be handled in a confidential manner and shall not be disclosed or discussed with any persons who have no legitimate claim to such information.
- 7.2. No person shall supply any information with regard to allegations or incidents of fraud and corruption to the media without the express permission of the Vice-Chancellor.

## 8. Fraud and Corruption Risk Management

- 8.1 The University shall apply prevention controls and detection mechanisms as outlined in its Fraud and Corruption Control Plan (attach Fraud Control Plan)
- 8.2 The University shall undertake fraud risk assessment every six months whilst updating its College/Division Local Risk Register in accordance with the Risk Management Framework
- 8.3 The Senior Management Team must establish effective prevention controls and detection mechanism in areas that have a higher risk of fraud and corruption occurring. This can include:

- Procurement of goods and services
- Student admissions and records
- Donor Funding



- Recruitment
- Capital Projects
- Inventory
- System Access and Data Management
- Conflict of interest
- Conduct of research

## 9. Creating Awareness

9.1. Heads of Budgetary Units shall be responsible for ensuring that all employees under their control and are made aware of and receive the relevant policy documentation.

10. This Policy shall be read in conjunction with:

1. [www.fnu.ac.fj/new/images/policies-regulations/hpn.pdf](http://www.fnu.ac.fj/new/images/policies-regulations/hpn.pdf)
2. <https://www.fnu.ac.fj/new/fnu-hr-policies/code-of-conduct-policy>
3. **Whistleblower Protection Policy**