

# Fraud and Corruption Control Policy

## Schedule 1 - Examples of Corruption, Fraud, Public Interest Disclosures and High Risk Areas

### Fraud and Corruption

(1) Refer to the definitions section of the [Fraud and Corruption Control Policy](#) for the definitions of fraud and corruption.

### Public Interest Disclosures

(2) Public interest disclosures under the [Public Interest Disclosures Act 2012](#) are allegations of improper conduct or detrimental action by a current or former RMIT employee or Council member. These cannot be investigated by RMIT and must be reported to the Victorian [Independent Broad-based Anti-Corruption Commission \(IBAC\)](#).

(3) Improper conduct may be:

- a. criminal offences or corrupt conduct
- b. serious professional misconduct
- c. dishonest performance of RMIT functions
- d. intentional or reckless breach of public trust or misuse of information
- e. substantial mismanagement of RMIT resources
- f. substantial risk to health or safety of a person or substantial risk to the environment
- g. conduct by an RMIT officer that adversely affects the honest performance of their functions
- h. conduct by an RMIT officer that is intended to adversely affect the effective performance of their functions for the benefit of another person.

(4) Detrimental action is a reprisal against someone who makes a public interest or whistleblower disclosure. It includes intimidation, harassment, discrimination or disadvantaging them in relation to their employment or career.

(5) Employees can seek advice from Central Complaints and Investigations ([investigations@rmit.edu.au](mailto:investigations@rmit.edu.au)) or the Whistleblower Coordinator ([whistleblower@rmit.edu.au](mailto:whistleblower@rmit.edu.au)) if they are uncertain about whether to disclose suspected fraud or corruption to RMIT or to an external body.

### High risk areas

(6) The following table lists examples of high-risk areas for fraudulent or corrupt conduct.

Area	Example
Misuse of assets	Use of RMIT funds or resources for personal use Unauthorised sale of RMIT assets for personal gain
Misuse of position	Paying or accepting kickbacks or secret commissions from or to third parties Receiving or offering a bribe to influence a decision Improperly using a position to gain advantage for oneself or another person

Travel	<p>Unapproved travel or travelling in a fare class for which they are not eligible as per the Travel Policy</p> <p>Making false claims against RMIT's travel insurance program</p> <p>Luxurious, indulgent or excessive expenditure beyond the parameters set out in the Business Expenses Policy and Schedules</p> <p>Inflated or faked expense claims</p>
IT and data assets and security	<p>Unauthorised access, use, release or destruction of data for personal advantage</p> <p>Sharing of usernames and passwords to unauthorised people for a fee or other benefit</p> <p>Accepting bribes for admission of students or creating fraudulent transcripts for students</p>
Regulatory compliance	<p>Providing false or misleading information</p> <p>Failing to provide information where there is a legal obligation to do so</p>
Personnel records / confidential information / privacy	<p>Use or disclosure of personal information for an improper purpose</p> <p>Unauthorised or unlawful alteration of personal information</p> <p>Appointments without merit and motivated by personal relationships</p>
Salaries, wages, allowances, reimbursements	<p>Payments to phantom employees</p> <p>Payment to an employee for tasks not performed</p> <p>Reimbursement to an employee for purchasing goods or services they were not entitled to</p> <p>Payment to an employee for skills they do not have</p>
Contract management	<p>Accepting bribes or kickbacks from suppliers</p> <p>Negligent or deliberate mismanagement of contracts which may include non-compliance with contract schedules or rates, misrepresentation of dates, description of services or identities of contract providers</p> <p>Incorrect charging for labour and material, misuse of assets or product substitution (substituting a product for one of lesser quality)</p>
Tendering	<p>Failure to comply with tender procedures</p> <p>Manipulating a tender process for improper benefit or advantage</p> <p>Unauthorised or improper release of pricing or other tendering information</p> <p>Accepting or offering gifts and benefits contrary to the Gifts, Benefits and Hospitality Policy</p> <p>Non-compliance with the Conflict of Interest Policy</p>
Credit cards, EFTPOS	<p>Making or using forged or falsified documents or signatures</p> <p>Inappropriate use of RMIT credit cards, including for personal purchases</p>
Purchases and accounts payable	<p>Entering a commercial transaction where there is a conflict of interest (without complying with the Conflict of Interest Policy)</p> <p>Invoice and purchase order splitting to circumvent procedures or delegation levels</p> <p>Causing, assisting or enabling unauthorised or illegal transfers of funds</p> <p>False documentation in support of invoices</p> <p>Creation and payments made to fictitious suppliers</p>
Conflicts of interest	<p>Failing to disclose an actual, perceived or potential conflict of interest contrary to the Conflict of Interest Policy</p> <p>Failing to actively manage a disclosed conflict of interest</p> <p>Allowing a conflict of interest to undermine your independence</p> <p>Receiving a personal benefit for assisting a person or entity to gain work or business at RMIT</p> <p>Appointing a person to a position due to personal relationships or motives other than merit</p>

## Status and Details

<b>Status</b>	Current
<b>Effective Date</b>	27th June 2025
<b>Review Date</b>	27th June 2030
<b>Approval Authority</b>	Manager, Central Policy
<b>Approval Date</b>	11th June 2025
<b>Expiry Date</b>	Not Applicable
<b>Policy Owner</b>	Fiona Notley Chief Operating Officer
<b>Policy Author</b>	Laijing Lee General Counsel (Interim)
<b>Enquiries Contact</b>	Central Complaints and Investigations