THE PAPUA NEW GUINEA
UNIVERSITY OF TECHNOLOGY

# Fraud and Corruption Prevention Policy

## 1. Intent

PNGUoT has no tolerance to fraud and corruption in relation to any of its operations, and will take appropriate action if any instance is detected. The University operates in a culture consistent with the Codes of Conduct for staff, students and Council, and relevant legislation.

## 2. Scope

2.1 This Policy applies to Council Members, all employees and students of the university, contractors, associates, adjuncts and visitors / clients.

2.2 The Policy covers both the academic and administrative operations of the University.

## 3. Definitions

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| 3.1 | **Fraud** | refers to, but is not limited to, dishonest acts, theft, misappropriation of money or assets, disclosing confidential information, bribery, blackmail, dishonest use of intellectual property (incl falsifying data, plagiarism), forging or falsifying documents and failing to follow due process. |
| 3.2 | **Corruption** | refers to dishonest or criminal offenses undertaken by persons entrusted with positions of authority to acquire illicit benefit or abuse power for personal gain. |

## 4. Policy

4.1 PNGUoT does not tolerate fraud, corruption, misconduct, criminal or improper conduct.

4.2 PNGUoT adopts a risk management approach to the prevention, detection and investigation of suspected fraudulent activity.

4.3 PNGUoT is committed to maintaining an organisational culture which ensures effective fraud and corruption control is an integral part of all university activities, consistent with the University's Staff Code of Conduct and relevant legislation.

4.4 PNGUoT is committed to have in place an effective system of internal controls and procedures, through its management, an effective Internal Audit function, an audit committee and sound policies and delegations, for the prevention and detection of corrupt conduct or fraudulent activities.

4.5 Visitors and clients who are found to be involved in fraud and corruption activities against the University will be reported to the police to be dealt with by the existing National Laws and Regulations.

4.6 Roles and responsibilities:

a) **Council** has responsibility for oversight of fraud and corruption prevention. It approves policy and receives advice through the Finance, Risk and Audit Committee, on fraud and corruption, and risk management issues, as required.

b) The **Vice Chancellor** is responsible for developing and maintaining an effective internal control structure within the University and its operations, and determining the appropriate course of action with regard to investigation and communication of incidents.

c) The **Chief Internal Auditor** will identify those areas of operation that are generally considered to be most open to subversion or corrupt practices, and establish a plan to investigate these areas and highlight risks on the risk management register.

d) **Senior Executive Management, HOD's and Section managers** are responsible for the prevention and detection of acts of fraud and corruption, and reporting suspected acts to the Registrar and/or the Vice Chancellor who will commission an investigation or deal with the reported fraud and corruption act.

e) **All staff** have a responsibility to comply with policies and procedures relating to Fraud and Corruption, and upholding the Staff Code of Conduct.

4.7 Overall prevention process:

a) Identification, assessment and management of the risk of fraud and corruption are to be an integral part of the Univerity's Risk Management process.

b) The Vice Chancellor is responsible for the establishment of a cost-effective internal control structure for the operations of the University.

c) The Chief Internal Auditor will be responsible for the development and operation of various control mechanisms relating to financial operations, and the internal audit program including other compliance issues.

d) Individual managers are responsible for maintaining internal control structures within their organisational responsibility.

e) All staff should be aware of the provisions in the PNGUoT Whistle Blower Policy.

## 5. Related Policy Instruments

5.1 Internal audit program.

5.2 PNGUoT Risk Management Framework and Procedures

5.3 Staff Code of Conduct

5.4 PNGUoT Whistle-Blower Policy

5.5 PNGUoT Conflict of Interest Policy

## 6. Schedules/Appendices

## 7. Related Documents and Legislation

7.1 Constitution of PNG

7.2 Papua New Guinea University of Technology Act 1986

7.3 Organic Law on Duties and Responsibilities of Leadership

7.4 Public Finance (Management) (Amendment) Act 2016

7.5 National Procurement Act 2018

7.6 Criminal Code Act 1974

7.7 Proceeds of Crime Act 2005

7.8 Criminal Practice (Fraud & Corruption Related Offences) Rules 2013

7.9 Mutual Assistance in Criminal Matters Act 2005

## 8. Approval Details

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| **Policy Sponsor** | Vice Chancellor |
| **Approval Authority** | University Council (193rd Council Meeting)<br><br>Dame Jean Kekedo — Date: 20/08/2021<br>Chancellor |
| **Date for next Major Review** | August 2024 |

## 9. Revision History

| Version | Approval Date | Implementation Date | Details | Author |
|---|---|---|---|---|
| B_F&CPP01 | 06 /08/2021 | August 2021 | Policy Established | Goverance & Policy Unit |

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