



Governance

Anti-Fraud and Corruption Policy & Procedure

Purpose

This Anti-Fraud and Corruption Policy demonstrates Mayfield Education's commitment to the prevention of fraud and corruption across all of its operations. This policy sets out the procedures for the prevention and identification of fraud and corruption in line with regulatory and legislative requirements and the methods used for communicating this information to staff, students and governance bodies. In addition, it outlines the mechanisms employed for addressing cases of fraud and corruption, principally within the areas of corporate governance and financial management.

Audience

This policy applies to all personnel who are actively associated with Mayfield Education and any entity that is controlled by Mayfield Education.

Definitions

Fraud: Dishonestly acquiring, or attempting to acquire, a benefit/advantage for any group or individual to the detriment of Mayfield Education or its controlled entities.

Bribery: Offering any person undertaking duties on behalf of Mayfield Education an inducement or reward, financial or otherwise, so as to influence their behaviour.

Corruption: Misuse of conferred power or position for personal or private gains.

Maladministration: Conduct that results in unauthorised or irregular use of Mayfield Education's money or any significant mismanagement of Mayfield Education's resources.

Misconduct: The contravention of any relevant code of conduct while acting in the capacity of a Mayfield Education employee that amounts to grounds for disciplinary action.

Policy

The Mayfield Education's attitude towards fraud and corruption:

- Zero tolerance for fraud or corruption.
- Prevent instances of fraud and corruption by creating, implementing, and frequently reviewing strategies for prevention, detection, and control of fraud and corruption.
- All controlled entities are to adopt measures that aim at preventing opportunities for fraud and corruption in the exercise of their core business.
- Recognise its responsibilities as stipulated under Federal and State legislation and will at all times liaise in any inquiry into corruption, maladministration, or misconduct at Mayfield Education, as required.
- Comply with any applicable State and Federal laws and regulatory requirements related to financial management, corporation law, anti-money laundering, trade practices, and workplace relations.

The approach of the Mayfield Education towards fraud and corruption:

- Adopt a robust approach to the prevention and detection of fraud and corruption, in line with the Australian Standards for Fraud and Corruption Control.
- All staff are informed of their duty to report suspected fraud and corruption and are expected to comply with obligations to report to or to liaise with external agencies.
- All information pertaining to suspected fraud and corruption at Mayfield Education will be gathered, classified, and properly handled.
- Manage disclosures based on the Whistleblowers Protection Act 2001 and the Whistleblowers Protection Amendment Act 2008.
- All communications on behalf of Mayfield Education regarding fraud and corruption will be determined by the Board of Directors or its CEO as its representative. All communications by individuals not designated by the Board of Directors will be considered unauthorised.

Staff Responsibilities

- Staff are responsible for supporting and implementing the execution of anti-fraud and corruption control strategies, within their appropriate capacity.
- Staff are not to partake in, or directly or indirectly support fraudulent and corrupt activity.
- Any potential or suspected fraud and corruption should be reported based on procedures in this Policy. Staff are expected to cooperate with any investigations.
- In the case of the identification of fraudulent and corrupt behaviour, staff are to safeguard confidentiality and follow Mayfield Education's communication protocols.
- Managers are to support and monitor initiatives, strategies, and systems for fraud and corruption control in their areas of responsibility.
- The failure of any staff to adhere to this policy may lead to disciplinary action, the termination of contracts, or referral to the relevant regulatory and law enforcement agencies.

High-Risk Areas of Operation

Management should recognise that some activities offer a higher potential risk for fraud and corruption, and should take measures to ensure there are effective prevention and detection measures instituted for the following activities:

- Procurement
- Recruitment
- Financial transactions
- Payroll
- Grants and funding
- IT systems
- Intellectual property and confidential information
- Student admissions and records
- Capital works projects, property maintenance, and management services
- International engagements
- Management of external service providers and suppliers

Procedures

Prevention

Management is to develop strategies, initiatives, and systems for the prevention of fraud and corruption. All senior staff members responsible for management within Mayfield Education or its controlled entities are expected to:

- Uphold and foster high standards of ethical and professional conduct.
- Ensure there are appropriate internal controls instituted across all operational systems to prevent fraud and corruption.
- Implement and manage fraud and corruption detection programs and risk assessments within their areas of responsibility.
- Evaluate the internal control environment following each detected instance of fraud and corruption.

All staff, especially those managing higher-risk areas, are to:

- Be sensitive to the possibilities of fraud and corruption in their areas, evaluate risks associated with their specific processes, and actively address those risks in line with Mayfield Education's Risk Management Policy.
- Assist senior managers in the implementation of strategies and initiatives in response to fraud and corruption risks.
- Participate in regular internal reviews within their areas and report any material alterations in circumstances, responsibilities, or risk ratings to their manager.
- Attend all relevant training regarding processes surrounding fraud and corruption.

The Board of Directors/CEO is to ensure that fraud and corruption-related information is incorporated into Mayfield Education's employee induction processes.

- Fraud and Corruption Control Plan

The Board of Directors or CEO as its representative will:

- Be responsible for overseeing the implementation of the fraud and corruption policy.
- Be responsible for the periodic review of this Anti-Fraud and Corruption Policy.

- Publish reports on the institutional response to any instances of fraud and corruption.

Procedure for reporting instances of fraud or corruption

- All staff should report any suspected fraud or corruption in the first instance, to their manager, CEO or a member of the Board of Directors.
- Reports can be made orally or in written form and should detail the grounds for the suspicion of fraud or corruption. Any report made to external agencies is also to be incorporated in the report to Mayfield Education.
- Reporting and response to fraud and corruption should be in good faith and confidential in nature.
- If the reporting procedure is inappropriate, an individual may report through “protected disclosure”, as provided for in the Whistleblowers Protection Act 2001 and Whistleblowers Protection Amendment Act 2008.
- Management is to communicate all reports that have the potential to impact the reputation and operation of Mayfield Education to the CEO as a Board of Directors representative.

Response

In responding to reports of fraud and corruption, staff receiving the report will present the available evidence to the CEO who will report to the Board of Directors.

- The Board of Directors will function as the central referral point in relation to all reported allegations and will provide advice based on recommendations provided by the CEO on measures to be employed by the affected area of Mayfield Education, as well as give reports on the progress of the investigations into the alleged fraud or corruption.
- The Board of Directors is also to convene and oversee a Fraud and Corruption Investigation Task Force, as necessary and based on the nature of the report. The Board of Directors/CEO is to ensure all cases of suspected fraud and corruption are properly recorded, investigated, and resolved reasonably.
- The CEO as a Board of Directors representative will issue, authorise, and monitor all communication protocols pertaining to any allegation, investigation, or referral to the relevant regulatory bodies or law enforcement agencies.

Policy Review

This policy is subject to review every two years by the CEO as a Board of Directors representative. Revisions may be made more frequently if necessary.

Further Assistance

For any enquiries in relation to this policy, please consult the Corporate Board.