

# SCHEDULE A: INTEGRITY FRAMEWORK



# Integrity Framework – A Process View

Govern

Audit and Risk Committee (ARC)  
Oversight

Respond

Executive Reporting  
and Oversight

Investigations

Detect

Detection /  
Monitoring

Exception  
Reporting

Record Keeping

Prevent

Policies

Training and  
Awareness

Risk Assessment

Controls

3<sup>rd</sup> Party Due  
Diligence

Ethical Leadership

Culture

Review and Improve

Legislation

# Integrity Framework – Key Processes

## Govern

Audit and Risk Committee (ARC)  
Oversight

The ARC will receive a consolidated Integrity Report annually outlining the progress made on Deakin's Integrity framework. This will include significant cases, trends, and an assessment of both the risk and the control environment. The ARC also receive an annual report on Academic fraud from the Deputy Vice-Chancellor (DVC) Education. The ARC also receive an annual report from Internal Audit concluding on the adequacy of Deakin's Internal control framework

## Respond

Executive Reporting  
and Oversight

Investigations

- Academic Board, DVC Research, Chief Financial Officer and Chief Operating Officer (Executive Director Human Resources) provide oversight of integrity related issues in their respective areas and provide a report to the ARC 6 monthly including significant cases, trends and an assessment of both the risk and the control environment
- The ARC, Vice-Chancellor, DVC Research, Academic Board, Chief Financial Officer or Executive Director Human Resources have vested powers to request investigations
- These may be resourced either internally by Internal Audit, or externally as appropriate
- Investigation procedures and checklists are to be used

## Detect

Detection /  
Monitoring

Exception  
Reporting

Record Keeping

- The Academic Board, DVC Research, Chief Financial Officer and Chief Operating Officer (Executive Director Human Resources) will have appropriate fraud and corruption detection mechanisms in place
- Internal Audit will consider potential fraud / corruption risks and controls on each Audit and the use of Analytics
- Risk and Compliance will submit a consolidated Risk Assessment and Control Report every 6 months to the CFO
- All detective activities are to be followed up, conclusions drawn and records kept
- All investigations are to be documented and appropriate records kept

# Integrity Framework – Key Processes

Prevent

Policies

Accountable: Policy Owners

## ACADEMIC

- [Student Code of Conduct](#)
- [Academic Integrity policy](#)
- [Academic Freedom policy](#)
- [Examinations procedure](#)
- [Higher Degrees by Research policy](#)
- [Admissions Process, Enrolment, Fees and Charges policy](#)
- [Student General Misconduct procedure](#)
- [Student Academic Integrity policy](#)
- [Student Complaints Resolution policy](#)
- [Intellectual Property \(Students\) policy](#)

## RESEARCH

- [Research Conduct policy](#)
- [Procurement policy](#)
- [Staff Research Misconduct procedure](#)
- [Student Research Integrity procedure](#)
- [Australian Research Council Research Integrity and Research Misconduct Policy](#)
- [Intellectual Property \(Staff\) policy](#)
- [Staff Misconduct Research procedure](#)

## GENERAL / FINANCIAL

- [Code of Conduct](#)
- [Conflict of Interest procedure](#)
- [Gifts and Hospitality Acceptance policy](#)
- [Business Expenses policy](#)
- [Travel policy](#)
- [Credit Card policy](#)
- [Delegations of Authority policy and procedure](#)
- [Financial Delegations policy](#)
- [Procurement policy](#)
- [Intellectual Property \(Staff\) policy](#)
- [Protection of Persons from Detrimental Action procedure](#)

## PEOPLE

- [Workplace Relations policy](#)
- [Performance Management policy](#)
- [Workplace Bullying policy](#)
- [Health, Wellbeing and Safety policy](#)
- [Discrimination, Sexual Harassment, Victimization and Vilification \(Staff\) Complaints procedure](#)
- [Equity and Diversity policy](#)
- [Employment of Staff policy](#)
- [Staff Development policy](#)
- [Staff Discipline policy](#)
- [Enterprise Agreement](#)

Prevent

Training and Awareness

- The Academic Board, DVC Research, Chief Financial Officer and Chief Operating Officer (Executive Director, Human Resources) will have appropriate training and awareness regimes in place to ensure compliance with policy. The Executive Director, Human Resources will support the development and maintenance of that training. This will include:
  - Ethics Training
  - Induction Training
- Awareness campaigns
- Fraud and Corruption Training
- Cyclic Training – resit
- Student Communications
- Leadership Training

# Integrity Framework – Key Processes

Prevent

Risk Assessment

Accountable: Risk and Compliance Manager

- All risk assessments completed will require an assessment of the Fraud / Corruption risk
- Risk and Compliance will provide the systems for business leaders to maintain their risks and receive quarterly updates on risk mitigation strategies

Prevent

Controls

Accountable: Various

- University Council Oversight
- Executive Oversight
- Fraud Control Plan
- Policies
- Procedures
- Exception reporting
- Investigations and reporting
- Detective controls and monitoring
- Risk Assessment and management
- Employment Contracts
- Induction Training
- Awareness campaigns
- Policy review
- Ease of Access on Web
- Cyclic Training – resit
- Student Communications
- Leadership Training
- Ethics Training

Prevent

3<sup>rd</sup> Party Due Diligence

Accountable: Various

- All major suppliers, joint venture parties and contracted business dealings have had a due diligence conducted

# Integrity Framework – Key Processes

Prevent

Ethical  
Leadership

Accountable: Vice-Chancellor

- All Executives and Senior Management to undertake Ethics Training and Fraud and Corruption Training
- Performance Management Contracts clear on behaviour, leadership and culture
- The leadership team all hold a zero tolerance to unethical behaviour, fraud and corruption

Prevent

Culture

Accountable: Vice-Chancellor

- Culture is established by the Vice-Chancellor and Executive through ethical leadership practices and “tone from the top”
- Culture is reinforced through a zero tolerance position, strong and frequent communication and decisive management action where breaches occur

Prevent

Review and  
Improve

Accountable: Chief Financial Officer

- The program will be subject to an annual review by Internal Audit to ensure it continually drives ethical behaviours and legislative compliance