

# WORONI

Australian National University Student Media

---

## FRAUD MANAGEMENT POLICY

### 1. Purpose:

1. To ensure that all parties are aware of their responsibilities for identifying exposures to fraudulent activities and for establishing controls and procedures for preventing such fraudulent activity and/or detecting such fraudulent activity when it occurs
2. To provide guidance to Editors, volunteers and Members as to what action should be taken where they suspect fraudulent activity
3. To ensure that all suspected fraudulent activity will be fully investigated

### 2. Policy:

1. Woroni will not tolerate any fraud in any aspect of its operations
2. Woroni will investigate any suspected acts of fraud, misappropriation or other activity with regards to the Association
3. An objective and impartial investigation, as deemed necessary, will be conducted regardless of the position, title, length of service or relationship with the organisation of any party who might be subject to such an investigation
4. Any fraud shall constitute grounds for dismissal in accordance with the Constitution, Regulations, Procedures and Policies of the Association
5. Any serious case of fraud, whether suspected or proven will be reported to the police
6. Fraud prevention procedures are incorporated into the Associations Expenses and Reimbursements, Gifts and Entertainment, Procurement and Purchases and Debit Cards policies
7. No Editor, volunteer or Member or person acting on behalf of the Association in complying with this policy shall:
  - a) Be dismissed or threatened to be dismissed;
  - b) Be disciplined or suspended or threatened to be disciplined or suspended;
  - c) Be penalised or any other retribution imposed; or
  - d) Be intimidated or coercedUnless for reasons external to this policy as outlined in the Dismissal and Rehiring policies. Violation of this clause will result in disciplinary action up to and including dismissal
8. Where an allegation is made in good faith, but is not confirmed by the investigation, no action will be taken against the originator

### 3. Other Policy Documents:

This policy should be read in conjunction with the Association's Constitution and Expenses and Reimbursements, Gifts and Entertainment, Procurement and Purchases and Debit Cards policies

#### 4. Procedure:

1. The Board of Editors has ultimate responsibility for the prevention, detection and investigation of fraud and is responsible for ensuring that appropriate and effective internal control systems are in place
2. All directors are responsible for investigating instances of fraud reported to them, or ensuring that these instances are investigated
3. All Editors and volunteers must ensure that there are mechanisms in place, within their area of control, to:
  - a) Assess the risk of fraud;
  - b) Educate employees about fraud prevention and detection; and
  - c) Facilitate the reporting of suspected fraudulent activities
4. All Editors and volunteers share in the responsibility to prevent, detect and report fraud
  - a) Fraud begins with dishonesty, including beyond the financial sphere. All Editors and volunteers should maintain a high level of transparency about the organisation's operations and Editor and volunteer fulfilment of their responsibilities.
5. Any Editor or volunteer who suspects fraudulent activity must immediately notify both the Editor-in-Chief and the Managing Editor
  - a) Subject to this, a volunteer may report suspected fraudulent activity to their Editor at which point the Editor must report this to the Editor-in-Chief and Managing Editor
  - b) Where the Editor-in-Chief or Managing Editor is suspected of involvement, the report should be made to the one not suspected and to the Deputy Editor-in-Chief
  - c) Where two members of the Executive are suspected of involvement, the report should be made to the Executive not suspected and another member of the Board of Editors, who must escalate this report immediately to the University Administration (i.e. the Director, University Experience)
  - d) Where all members of the Executive are suspected, the report should be made to at least three General Editors who must immediately escalate this report to University Administration (i.e. the Director, University Experience)
6. Once a report has been received by the relevant person/s, they will immediately arrange an initial investigation of the suspected fraud (in accordance with Appendix A)
  - a) Every effort will be made to keep this investigation confidential, subject to constitutional and legal requirements
  - b) From time to time other Editors, volunteers or Members may need to be consulted in conjunction with this investigation
7. Following an initial investigation and a determination that the suspected activity warrants further investigation, the relevant person/s shall coordinate the investigation with the appropriate law enforcement officials, including police
  - a) Subject to this, the Deputy Vice-Chancellor Student and University Experience will be notified of this investigation and determination
  - b) The Associations' lawyers and auditors will be contacted and involved as deemed appropriate
  - c) At the discretion of the Board, the findings of the initial investigation may be presented to the accused, including all evidence. Each accused then has the right to present counterevidence to the Board at a date determined by the Board.

- d) Any investigation undertaken by law enforcement officials shall be independent of employment-related investigations by the Association
- 8. Once suspected fraud is reported, the relevant person/s will act immediately to prevent the theft, alteration or destruction of relevant records, such action includes, but is not limited to:
  - a) Removing physical records and placing them in a secure location,
  - b) Limiting access to the location where the records currently reside,
  - c) Preventing the individual suspected from accessing the records, and
- 9. Once suspected fraud is reported, the relevant person/s will act immediately to prevent further financial loss to Woroni; such action can include but is not limited to:
  - a) Contacting the relevant bank to request that Woroni's funds be moved to accounts that cannot be easily accessed by the person suspected of fraud, and
  - b) Restricting access to any financial resources in cash the organisation may hold, for example by changing the password to any cash boxes.
  - c) These actions are to be taken only when they do not risk interference with any investigation of pre-existing fraud.
- 10. If the suspicion of fraud is substantiated by the investigation, disciplinary action, up to and including dismissal shall be taken
  - a) For any volunteer of the association, fraud is a cause for immediate dismissal
  - b) Where the case relates to an Editor/s of the Board, the Constitution mandates the removal process
    - i Due to the delay caused by the Constitutional process, a unanimous vote of the Board (where the member/s suspected cannot vote) may temporarily suspend a Board member/s from their duties until the Constitutional process can be implemented.
      - 1 In the case of suspected involvement of multiple Board members, the vote to suspend each suspected Board member must be separate motions.
      - 2 In the case of suspected involvement of multiple Board members, the unanimous vote must consist of half of the current Board plus one.
      - 3 In the case of suspected involvement of multiple Executive members, the vote to suspend each suspected Executive member may be moved to an email vote in order to meet quorum.
      - 4 Where this occurs, the suspected Board member/s must immediately be removed from all communication channels of the Association and their access to the Association's office must be revoked and their access to the Association's assets (physical and liquid) revoked
- 11. The Association will take all reasonable steps, including court ordered restitution, to obtain recovery of the losses from the offender

#### 5. Policy Details:

This policy replaced the previous Fraud Management Policy on 13/10/2022  
 This policy was last updated 18/5/23

## Appendix A: List of Actions in Relation to the Detection, Suspicion or Allegation of Fraud

1. Alert the Editor-in-Chief and Managing Editor (or other person/s in accordance with 4.5.) of the allegation or suspicion of fraud
2. Document details of the report, date, time of report or initial discovery
3. Make notes of observations and actions taken in relation to the matter as soon as possible
4. Tell only those whom it is necessary
5. Do not confront the suspect
6. Obtain full details
  - a. What is alleged to have occurred
  - b. Who is alleged or suspected
  - c. Is the behaviour ongoing or in the past
  - d. Value of the loss or potential loss
  - e. Other people aware of the issue
7. Identify evidence and sources of evidence that may be connected to the issue
  - a. Invoices, contracts, purchase orders, bank statements
  - b. Other relevant documents (spreadsheets)
  - c. Accounting records
  - d. Emails and other electronic communications
  - e. Computers
  - f. Any other potential sources of evidence
8. Obtain evidence and place in a secure location at a time that will not alert any potential suspects, if this is not possible (e.g. the removal of a computer from the office) do not take the step as it is more important that the suspect/s are not alerted
9. Create an evidence log with a description of each item
10. Do not examine computer-based evidence, secure this for subsequent examination, only forensically trained IT experts should examine computer based evidence
11. Identify potential witnesses
12. Where practical, remove a suspect's access to relevant computers and systems - this may include changing the passwords on computers or accounts
13. Consider other avenues of investigation
14. If the conduct is ongoing, take steps to prevent further loss
15. Leave serious investigations to those who have the necessary skills and experience, efforts by the inexperienced can jeopardise the outcome of an investigation