



FRAUD, CORRUPTION AND SERIOUS WRONGDOING PROCEDURE

Version:	Approved by:	Approval Date:	Effective Date:	Next Review:												
1	Audit and Risk Committee	10 Oct 2024	10 Oct 2024	10 Oct 2026												
Policy Custodian:	Executive Director, Commercial and Legal		Document No:	UOWE-LGL-PRO-12												
Purpose:	<p>This Procedure outlines UOW Global Enterprises' (UOWGE) management of Reports of Serious Wrongdoing in compliance with the PID Act 2022 and other relevant legislation governing bribery or other forms of corrupt conduct.</p> <p>This Procedure supports the <i>Fraud, Corruption and Serious Wrongdoing Reporting Policy</i> through outlining the processes and responsibilities for Reporting and investigating allegations of Fraudulent and/or Corrupt Conduct.</p>															
Scope:	<table border="1"><tr><td>UOWGE</td><td>✓</td><td>UOWCA</td><td>✓</td><td>UOWD</td><td>✓</td><td>UOWCHK</td><td>✓</td><td>UOWMKDU</td><td>✓</td><td>UOWI</td><td>✓</td></tr></table> <p>This Procedure applies to, and for the benefit of:</p> <ol style="list-style-type: none">All UOW Global Enterprises (UOWGE) Staff and Operations including:<ol style="list-style-type: none">UOW College Australia (UOWCA);University of Wollongong in Dubai (UOWD);University of Wollongong Malaysia, UOW Malaysia KDU Penang University College, UOW Malaysia KDU College, and UOW Malaysia College (collectively, UOWM);UOW College Hong Kong (UOWCHK);University of Wollongong- India Branch (UOWI); andUOWGE.Affiliates;Contractors, and their Staff working for UOWGE; andIndividuals, such as volunteers, who may perform public duties on behalf of UOWGE. <p>This Procedure does not apply to:</p> <ol style="list-style-type: none">People who have received services from UOWGE and want to make a complaint about those services. For information on how to do this, refer to the UOWGE website; andPeople, such as providers, who provide services to UOWGE, for example, employees of a company that sold computer software to UOWGE.				UOWGE	✓	UOWCA	✓	UOWD	✓	UOWCHK	✓	UOWMKDU	✓	UOWI	✓
UOWGE	✓	UOWCA	✓	UOWD	✓	UOWCHK	✓	UOWMKDU	✓	UOWI	✓					



Related Documents:	Code of Conduct Fraud, Corruption and Serious Wrongdoing Reporting Policy Records Management Policy Report Wrongdoing Form
References and Legislation:	<i>Independent Commission Against Corruption Act 1988 (NSW)</i> <i>GIPA Act</i> <i>Members of Parliament Staff Act 2013</i> <i>Public Finance and Audit Act 1983 (NSW)</i> <i>Public Interest Disclosures Act 2022</i> <i>Public Interest Disclosures Regulation 2022</i> <i>State Records Act 1998</i> <i>Criminal Code Act (1995) (Cth)</i>



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1. Definitions

Capitalised terms throughout this procedure have the following definitions:

Word/Term/Acronym:	Definition:
Affiliate	People engaged by UOWGE as agents or contractors (as opposed to employees), volunteers (including volunteer company directors or board members) and work experience students.
Agency	is as defined in clause 16 of the <i>PID Act</i> , and for the purposes of this Policy, includes all UOWGE institutions as agencies – in this policy, “agency” may refer to a UOWGE institution, or a different institution as defined in the <i>PID Act</i> , depending on the context.
Bribe / Bribery	<p>A Bribery offence is committed if a person undertakes any of the following actions with the intention of improperly influencing a Government Official or any other person in order to obtain or retain business or a business or personal advantage (whether or not for themselves):</p> <ul style="list-style-type: none">a) provides a benefit to another person; orb) causes a benefit to be provided to another person; orc) offers to provide, or promises to provide, a benefit to another person; ord) causes an offer of the provision of a benefit, or a promise of the provision of a benefit, to be made by another person
Contractor(s)	Individuals or entities who perform a task or provide a service to UOWGE, whether or not they are bound by a written contract to do so, e.g. security, cleaners.
Corrupt Conduct	<p>Corrupt Conduct, as defined in the <i>Independent Commission Against Corruption Act 1988 (NSW)</i> (“the ICAC Act”), is “deliberate or intentional Wrongdoing, not negligence or a mistake.” The conduct must involve or affect a NSW Public Official or public sector organisation (which by extension includes all UOWGE Institutions).</p> <p>While it can take many forms, Corrupt Conduct occurs when:</p> <ul style="list-style-type: none">1. Staff improperly use, or try to improperly use, the knowledge, power or resources of their position for personal gain or the advantage of others;2. Staff dishonestly exercise their official functions, or improperly exercise their official functions, breach public trust or misuse information or material acquired in their official functions;



Word/Term/Acronym:	Definition:
	<ol style="list-style-type: none"> 3. Staff influence, or try to influence, a Public Official (including UOWGE Staff) to use their position in a way that affects the probity of the Public Official's exercise of functions; 4. Staff commit Fraud; or 5. Staff engage in conduct that impairs, or could impair, public confidence in public administration.
Detrimental Action	<p>Any action causing, comprising or involving:</p> <ol style="list-style-type: none"> 1. Injury, damage or loss; 2. Intimidation or harassment; 3. Discrimination, disadvantage or adverse treatment in relation to employment; 4. Dismissal from, or prejudice in, employment; or 5. Disciplinary proceedings.
Disclosure Officer	Includes any Nominated Disclosure Officers and the Heads of Agency.
Fraud	<p>A subset of Corrupt Conduct. Deliberate and premeditated activity that involves the use of deception to gain advantage and/or obtain a financial benefit to the detriment of UOWGE.</p> <p>Examples include, but are not limited to:</p> <ol style="list-style-type: none"> 1. Acts or omissions; 2. Theft; 3. Making false statements; 4. Evasion; and 5. Manipulation of information.
Fraud and Corruption Control Committee (FCCC)	The Fraud and Corruption Control Committee is a high-level committee that assists the relevant Heads of Agency to discharge UOWGE's responsibilities regarding the management of, and response to, allegations of Serious Wrongdoing at UOWGE.
Government Information Contravention	<p>A failure to comply with the system through which people can access government information, i.e., a failure to properly fulfil functions under the <i>GIPA Act</i>. Examples include, but are not limited to:</p> <ol style="list-style-type: none"> 1. Destroying, concealing, or altering records to prevent them from being released;



Word/Term/Acronym:	Definition:
	<ol style="list-style-type: none"> 2. Knowingly making decisions that are contrary to the <i>GIPA Act</i>, and 3. Directing another person to make a decision that is contrary to the <i>GIPA Act</i>.
Government Official	<p>Government Officials include:</p> <ol style="list-style-type: none"> a) an employee, official or contractor of a government body or a wholly or partially state-owned enterprise; b) a person performing the duties of an office or position created under a law of a country or by the custom or convention of a country; c) a person in the service of a governmental body including a member of the military or the police force; d) a politician, judge, or member of the legislature of a state, province or country; e) an employee, contractor or person otherwise in the service of a public international organisation (such as the United Nations); f) an individual who is or who holds themselves out to be an authorised intermediary of a Government Official; g) a political party, party official or candidate for public office; h) a member of a royal family; or i) a commercial entity, or the directors, officers or employees of a commercial entity, in which a government body has a significant ownership interest or over which it otherwise exerts control (ie a foreign public enterprise or public university).
Head of Agency	<p>Is defined in the <i>PID Act</i>. For the purposes of this Policy and UOWGE, the Head of Agency refers to:</p> <ol style="list-style-type: none"> 1. UOWM - CEO Asia; 2. UOWD - President, UOWD; 3. UOWGE – Group CEO and Managing Director; 4. UOWCHK - President, UOWCHK; 5. UOWI - Campus Director; and 6. UOWC - General Manager.
Investigation	<p>An enquiry or enquiries regarding a specific matter, which can include auditing.</p>
Maladministration	<p>An act or omission of a serious nature that is contrary to law, unreasonable, unjust, oppressive or improperly discriminatory and based wholly or partly on improper motives. Examples include, but are not limited to:</p>



Word/Term/Acronym:	Definition:
	<ol style="list-style-type: none">1. Awarding contracts and tenders to parties that are related by family, friendship, or association without merit;2. Failing to decide in accordance with official policy for no appropriate reason;3. Breaches of natural justice and procedural fairness;4. Unauthorised disclosures of confidential information; and5. Failure to provide information where there is a legal obligation to do so.
Manager	A Public Official to whom the Public Official Reports directly or indirectly, or a Public Official who directly, or indirectly supervises the Public Official in the exercise of the Public Official's function.
Mandatory PID	A Report about Serious Wrongdoing that is made by a person because they have a legal obligation to make the Report, or because making that Report is an ordinary aspect of their role or function at UOWGE.
Nominated Disclosure Coordinator	A person responsible for receiving Public Interest Disclosures (PID) on behalf of UOWGE, who also acts as the Fraud and Corruption Prevention Officer. For the purposes of this Policy, the Nominated Disclosure Coordinator (NDC) is the UOWGE Executive Director, Commercial and Legal, whose responsibilities are set out in clause 12.4.
Nominated Disclosure Officer (NDO)	A person responsible for receiving Public Interest Disclosures (PIDs) for UOWGE.
Public Interest Disclosure (or PID)	A Report of Serious Wrongdoing that involves Corrupt Conduct, Maladministration, Serious and Substantial Waste of Public Money, or Government Information Contravention. It may be a Voluntary PID, Mandatory PID or Witness PID, as defined in the <i>PID Act</i> .
Public Official	Public Official is defined in the <i>PID Act</i> , and means: <ol style="list-style-type: none">1. a person employed in or by an Agency or otherwise in the service of an Agency;2. a person whose conduct or activities an integrity agency is authorised by another Act or law to investigate;3. an individual in the service of the Crown4. a statutory officer;5. A person providing services or exercising functions on behalf of an Agency, including a Contractor, subcontractor or volunteer;



Word/Term/Acronym:	Definition:
	<ol style="list-style-type: none"> 6. An employee, partner or officer of an entity that provides services, under contract, subcontract or other arrangement, on behalf of an Agency or exercises functions of an Agency, and are involved in providing those services or exercising those functions; 7. A judicial officer; 8. A Member of Parliament (MP), including a Minister; and 9. A person employed under the <i>Members of Parliament Staff Act 2013</i>.
Reasonable Grounds	Reasonable Grounds means a set of facts or circumstances that would indicate a judgement to be believed beyond suspicion.
Report	<p>Any report or disclosure of actual or suspected Wrongdoing within UOWGE.</p> <p>Note: some, but not all, Reports or disclosures are Public Interest Disclosures.</p>
Reporter	A person who makes a Report of known or suspected Serious Wrongdoing. This includes Staff, Contractors, consultants or any other individual performing public duties on behalf of UOWGE. A Reporter may also be commonly known as a “whistleblower” or “discloser”.
Serious Wrongdoing	Serious Wrongdoing for the purposes of this Policy generally relates to Wrongdoing that is so serious that it is clearly in the public interest that it be Reported, e.g. Corrupt Conduct, Fraud, Maladministration, Serious and Substantial Waste of Public Money. It does not refer to general misconduct that is covered by other UOWGE Policy documents, e.g. Bullying and Harassment.
Serious and Substantial Waste of Public Money	<p>The uneconomical, inefficient or ineffective use of resources, authorised or unauthorised, resulting in a loss or wastage of public funds or resources. Examples include, but are not limited to:</p> <ol style="list-style-type: none"> 1. Offering, making, soliciting, receiving, providing or accepting a Bribe, facilitation payment, secret commission, or improper gift; 2. False recordkeeping or money laundering; 3. Use of UOWGE funds or resources for personal use; 4. Purchasing unnecessary or inadequate goods and services;



Word/Term/Acronym:	Definition:
	<ol style="list-style-type: none">5. Manipulating a tender process to achieve a desired outcome;6. Misappropriate or misuse of UOWGE property;7. Overstaffing in particular areas without merit;8. Failing to make a decision in accordance with official Policy for no appropriate reason;9. Providing false or misleading information;10. Unauthorised disclosure of confidential information;11. Destroying, concealing or altering records to prevent them from being released;12. Luxurious, indulgent or excessive expenditure without merit; and13. Destroying, concealing or altering records to prevent them from being released luxurious, indulgent or excessive expenditure without merit.
Staff	A person employed by UOWGE including conjoint appointments, whether on continuing, permanent, fixed term, casual or cadet or traineeship basis. Any references to Staff in this Policy should be understood to mean both Staff and Affiliates.
Voluntary PID	A Report made to a Disclosure Officer or their Manager by a person because they decided, of their own accord, to come forward and disclose what they know.
Witness PID	<p>A Witness PID arises where a person discloses information during an Investigation of Serious Wrongdoing, at the request of or in response to a requirement of a person or agency investigating the serious wrongdoing, whether or not the Investigation—</p> <ol style="list-style-type: none">1. Relates to or arises from the making of a Voluntary PID; or2. Constitutes dealing with a Voluntary PID. <p>Note – it is not a Witness PID if such report is a Mandatory PID.</p>
Wrongdoing	See 'Serious Wrongdoing'.
UOW	University of Wollongong.
UOW Global Enterprises / UOWGE	UOWGE Ltd and its subsidiary and managed institutions including UOW College Australia (UOWC Ltd), University of Wollongong in Dubai (UOWD), UOW College Hong Kong (UOWCHK), UOW

Word/Term/Acronym:	Definition:
	Malaysia Group (UOWM) and University of Wollongong- India Branch (UOWI).
UOW Malaysia Group (UOWM)	University of Wollongong Malaysia, UOW Malaysia KDU Penang University College, UOW Malaysia KDU College, and UOW Malaysia College.
UOWCHK	UOW College Hong Kong.
UOWD	University of Wollongong in Dubai.
UOWI	UOW through its international branch campus in India.

2. Principles

- 2.1. UOWGE takes Reports of Serious Wrongdoing seriously. We are committed to building a 'Speak Up' culture where our Staff, students and Affiliates are encouraged to Report any conduct that they reasonably believe involves Wrongdoing.
- 2.2. UOWGE encourages Staff to Report all Wrongdoing regardless of whether they think it is Serious Wrongdoing. It is important to understand what is or may be occurring within the UOWGE environment. UOWGE will then ensure the Report is handled appropriately under the PID Act, or if it is not a PID, in line with other UOWGE policies and procedures. Even where a Report is not determined to be a PID, it will be managed in accordance with UOWGE's policy documents for dealing with Reports and complaints, where relevant.
- 2.3. UOWGE relies on our Staff and Affiliates speaking up when they become aware or suspicious of Wrongdoing. This Procedure, along with the associated *Fraud, Corruption and Serious Wrongdoing Policy*, documents UOWGE's commitment to building a 'Speak Up' culture. Part of that 'Speak Up' culture is having in place a framework that facilitates Reporting of Wrongdoing by:
 1. Protecting those who speak up from Detrimental Action; and
 2. Imposing duties on UOWGE to take appropriate action to investigate.
- 2.4. UOWGE is committed to:
 1. Promoting a culture of trust, integrity, ethical behaviour, accountability and transparency where persons are comfortable about Reporting Wrongdoing;
 2. Sincerely investigating all claims of Serious Wrongdoing (both conduct committed by Staff, and conduct committed against UOWGE or Staff by third parties);
 3. Encouraging and supporting persons to come forward if they have witnessed what they consider to be Wrongdoing within UOWGE;
 4. Immediate Reporting of any case of suspected or detected Serious Wrongdoing as per this Procedure;
 5. Treating all Reports of Wrongdoing with confidentiality and care, regardless of whether they meet the criteria for protection under the *Public Interest Disclosures Act 2022*;



6. Dealing with Reports impartially, promptly and reasonably and, if some form of Wrongdoing has been found, taking appropriate action;
 7. Keeping an internal Reporter informed of the progress of their Report and broadly of any outcomes;
 8. An ongoing risk-management approach to the prevention, detection and Investigation of Serious Wrongdoing;
 9. Ensuring Staff receive regular training focusing on identifying and Reporting Serious Wrongdoing;
 10. Ensuring Managers and supervisors at all levels understand the benefits of Reporting Wrongdoing, are familiar with this Procedure, and the *Fraud, Corruption and Serious Wrongdoing Policy*, for internal Reporting of Wrongdoing, and aware of the needs of those who make or are the subject of a Report; and
 11. Responding appropriately where acts of Serious Wrongdoing have been found to have been committed.
- 2.5. Disciplinary action, which may include termination of employment, will be taken against any Staff who commits, or participates in, any Serious Wrongdoing or conceals, or covers up Serious Wrongdoing, in accordance with this Procedure and the *Fraud, Corruption and Serious Wrongdoing Policy*. Where appropriate, UOWGE may refer the matter to a relevant external authority and/or initiate civil action to recover losses.
- 2.6. UOWGE will not tolerate any Detrimental Action, including harassment, or victimisation of individuals who make a Report of known or suspected Serious Wrongdoing. All such reports of Detrimental Action shall be If UOWGE receives any report of Detrimental Action, they must report this to the NSW Ombudsman under s34(4) of the PID Act. This shall be done by the NDC or delegate.

3. Making a Public Interest Disclosure Report

- 3.1. To meet the criteria of a PID, Reports of wrongdoing must be made to one (1) or more of:
 1. A Nominated Disclosure Officer (NDO) (NDO – refer to Schedule 1 for a list of NDO's);
 2. The NDO may lodge the Report themselves on the Reporter's behalf;
 3. A Manager - any Manager who receives a Report must make sure that the report is communicated through the *Report Wrongdoing Form* (preferred option) on behalf of the reporter or they may accompany the reporter to a Disclosure Officer to make the report; and/or
 4. The relevant Head of Agency.
- 3.2. All complaints and Reports that could potentially constitute a PID are to be lodged using the *Report Wrongdoing Form* which will be sent to the Nominated Disclosure Coordinator (NDC).
- 3.3. The NDC will refer the matter to the Fraud and Corruption Control Committee (FCCC) for management. The NDC will also inform the relevant Head of Agency that a Report has been received by UOWGE.
- 3.4. If the Reporter has given written consent to have their identity disclosed to the NDC, the NDC will contact the Reporter to:
 1. Inform them of the process to be undertaken;



2. Inform them of confidentiality requirements and any limitations;
3. Clarify information provided in the Report; and
4. If necessary, provide information about protections and support available and answer any questions the Reporter may have.

4. Referral to the Fraud and Corruption Control Committee (FCCC)

- 4.1. Upon receiving the Report from the NDC, the FCCC will:
 1. Review the information provided by *Reporting Wrongdoing Form*;
 2. Determine how the Report will be progressed, including whether the Report warrants action or Investigation;
 3. Determine if the Report must be referred to an external Investigation authority such as the Independent Commission Against Corruption (ICAC), the NSW Ombudsman and/or other agencies;
 4. Assess the likelihood of maintaining confidentiality;
 5. Conduct a risk assessment including assessing:
 - a. The risk of reprisal or Detrimental Action against the Reporter;
 - b. What protections and support are to be provided to the Reporter; and
 - c. Risks to the wellbeing of the subject of the Report.
 6. Recommend risk controls such as changes to the employment arrangements of either the Reporter and/or the subject of the Report.
- 4.2. The Reporter will be consulted prior to any risk controls being implemented.
- 4.3. The FCCC may recommend that the subject of the Report be suspended during the Investigation. Any such recommendation must be in writing to the relevant Head of Agency, and must include a Report on its initial assessment and recommendations on how the Report may be managed.
- 4.4. If the FCCC decides to neither investigate nor refer a voluntary PID, this must be reported to the NSW Ombudsman under s55(3) of the PID Act. This shall be done by the NDC or delegate.

5. Management of Suspected Cases of Serious Wrongdoing:

- 5.1. The relevant Head of Agency or delegate will report the matter to ICAC. The Report must be made:
 1. As soon as is practicable; and
 2. Prior to any internal Investigation.
- 5.2. The NDC will:
 1. Conduct an Investigation into the matter (this may involve engaging the services of an external investigator, or an appropriately skilled internal investigator);
 2. Provide the Reporter with:
 - a. Information about how the Report is to be dealt with;
 - b. Updates on the process, at least every three (3) months; and
 - c. General information on the status of the Investigation (ensuring that this does not



prejudice the Investigation or breach any privacy obligation).

3. Provide a final Report to the relevant Head of Agency and FCCC with findings and recommendations for actions to be undertaken.
4. Provide the Reporter with a final update (on completion of the Investigation), containing:
 - a. A description of the results of the Investigation
 - b. Information about any corrective action as a result of the Investigation.

6. Roles and Responsibilities

6.1. Certain people within UOWGE have responsibilities under the PID Act.

6.2. The relevant Head of Agency is responsible for:

1. Fostering a workplace culture where Reporting is encouraged;
2. Receiving Reports from Public Officials;
3. Ensuring there is a system in place for assessing Reports;
4. Ensuring UOWGE complies with this Policy and the *PID Act*;
5. Taking appropriate action against anyone who threatens or takes reprisal against an internal Reporter;
6. Taking appropriate remedial action in response to any findings that substantiate the allegations of Wrongdoing;
7. Implementing any organisational reform that is necessary to address systemic issues identified; and
8. Ensuring that UOWGE has appropriate systems for:
 - a. Overseeing internal compliance with the *PID Act*;
 - b. Supporting those who make Voluntary PIDs, including by minimising the risk of Detrimental Action;
 - c. Implementing corrective action if Serious Wrongdoing is found to have occurred;
 - d. Complying with Reporting obligations under s34(4) if the PID Act regarding allegations or findings of Detrimental Action;
 - e. Complying with annual Reporting obligations to the NSW Ombudsman; and
 - f. Complying with Reporting to the ICAC any matter where there is a reasonable suspicion that Corrupt Conduct has occurred or may occur.

6.3. The Fraud and Corruption Control Committee is responsible for:

1. Declaring any actual or perceived conflicts of interest prior to any decisions about a Report of Wrongdoing being assessed or considered;
2. Determining if a Report is a Public Interest Disclosure and how it will be dealt with;
3. Ensuring the principles of procedural fairness are adhered to;
4. Keeping the identities of all parties confidential as far as possible, where it is practical and appropriate to do so, and if it is not possible to maintain confidentiality, develop a strategy for supporting all parties involved and preventing Detrimental Actions;
5. Ensuring that adequate support is provided to the Reporter and the person who is the subject of the Report; and
6. Making recommendations on the systems and strategies that should be established to minimise any risk of Detrimental Action.



- 6.4. The Fraud and Corruption Prevention Officer is responsible for:
1. Acting as the Nominated Disclosure Coordinator;
 2. Managing UOWGE's response to any Public Interest Disclosures and allegations of Fraud and/or Corrupt Conduct;
 3. Receiving Reports of Serious Wrongdoing from internal or external Reporting persons;
 4. Coordinating the receipt of complaints and the coordination and conduct, where appropriate, of preliminary Investigations of complaints or, if required, referral to an alternative UOWGE process;
 5. Ensuring that complaints and applicable preliminary Investigations are forwarded to the Fraud and Corruption Control Committee;
 6. Ensuring Staff receive regular training focusing on identifying and Reporting Serious Wrongdoing;
 7. Ensuring UOWGE's compliance with Reporting obligations regarding allegations or findings of Detrimental Action;
 8. Ensuring UOWGE's compliance with annual Reporting obligations to the NSW Ombudsman;
 9. Implementing strategies to improve Fraud, Corruption and Serious Wrongdoing prevention, and Staff awareness of this Procedure and the *Fraud, Corruption and Serious Wrongdoing Policy* within UOWGE;
 10. Informing the relevant Head of Agency of any Report of Serious Wrongdoing within their Agency;
 11. Chairing the Fraud and Corruption Control Committee; and
 12. Being the point of contact for the Reporter.
- 6.5. Nominated Disclosure Officers are responsible for:
1. Receiving Reports from Public Officials;
 2. Receiving Reports passed on to them by Managers; and
 3. Ensuring any oral Reports received are recorded in writing.
- 6.6. Managers are responsible for:
1. Receiving Reports from Staff who they directly or indirectly manage;
 2. Treating all Reports of Serious Wrongdoing seriously in accordance with this Procedure, *Fraud, Corruption and Serious Wrongdoing Policy* or other relevant policy documents;
 3. Keeping the identity of the Reporter and anyone who is the subject of a Report confidential as reasonably possible; and
 4. Making sure that the Report is communicated to a Nominated Disclosure Officer on behalf of the Reporter, or they may accompany the Reporter to a Nominated Disclosure Officer to make the Report.
- 6.7. All Staff must:
1. Report suspected Wrongdoing and misconduct in accordance with this Procedure and *Fraud, Corruption and Serious Wrongdoing Policy*;
 2. Ensure that they and any Staff Reporting to them fully understand this Procedure, the UOWGE *Code of Conduct* and the *Fraud, Corruption and Serious Wrongdoing Policy*;
 3. Ensuring they complete regular training provided by UOWGE focusing on identifying and



Reporting Serious Wrongdoing

4. Ensure that their behaviour and conduct at all times reflects the Standards that are expected of all Staff under the *Code of Conduct*;
5. Use their best endeavours to assist in an Investigation of Serious Wrongdoing if asked to do so by a person dealing with a Voluntary PID on behalf of UOWGE;
6. Treat any person dealing with or investigating Reports of Serious Wrongdoing with respect; and
7. Not take Detrimental Action against any person who has made or is suspected to have made (or to soon make), a PID.

7. Change History

Version	Approved By	Date Effective	Amendment
1	UOWGE Director Commercial and Legal	10 October 2024	New Procedure Implemented. Replaces Fraud and Corruption Procedure.

Schedule 1 – Key Contacts

1. Reports Generally

For simple record-keeping, all Reports should be made using the “*Report Wrongdoing Form*” available on the UOWGE Website at <https://www.uowglobalenterprises.com.au>. If you wish to remain anonymous, the *Report Wrongdoing Form* is the best way to make a Report.

2. Heads of Agency

Agency	Head	Contact
UOWGE	Group CEO and Managing Director	Marisa Mastroianni <marisa@uow.edu.au>
UOWC	General Manager	Felix Lanceley <felixl@uow.edu.au>
UOWD	President	'Mohamed Salem' <MohamedSalem@uowdubai.ac.ae>
UOWCHK	President	Currie Tsang <ctsang@uow.edu.au>
UOWM	CEO Asia	Jennifer Ng <jenning@uow.edu.my>
UOWI	Campus Director	Nimay Kalyani <nkalyani@uow.edu.au>

3. Nominated Disclosure Officers

Nominated Disclosure Officer	Contact
UOWGE Executive Director, Commercial and Legal	Peter Janu <janup@uow.edu.au>
UOWGE Executive Director, People and Culture	Kerrie Field <kfield@uow.edu.au>