

12 month progress report

Investigation into allegations of corrupt conduct in the provision of security products and services by suppliers, installers and consultants

University of Western Sydney

Please update this schedule with information about the status of each item as at 13 February 2015. Include details of the latest action/update in respect of each initiative, dates where relevant and attach copies of any documents referred to, where possible, in support of implementation of particular initiatives. Please provide the name of a contact person in your agency from whom we can seek more detail if needed. Please return this document to the ICAC in writing and electronically to gtocher@icac.nsw.gov.au by no later than 13 February 2015.

Recommendation 1.

That NSW government agencies ensure that overall responsibility for identified tasks associated with the selection of security integrators is maintained in-house, including:

- **determining project budgets**
- **determining the scope of projects**
- **selecting tenderers to bid for contracts (in the case of limited and select tenders)**
- **communicating with tenderers**
- **coordinating tender evaluation panels and making recommendations**
- **evaluating tender submissions and writing selection reports.**

Summary of progress

The recommendation is being:

<tick one>

- Implemented as described in the report
- Implemented in an alternative way
- Partially implemented
- Not implemented

Action taken to implement recommendation

The University implemented a revised Procurement Policy effective from 2 December 2013. The Procurement Policy applies to all procurement undertaken at the University and was developed to conform to the New South Wales Government Guidelines on Procurement.

Part A of the Procurement Policy sets out the core principles and requirements for procurement of goods and services at the University. Part F of the Procurement Policy authorises certain units to negotiate and secure contracts for particular goods and/or services on its behalf, such as those leading to mandated or preferred suppliers mentioned in Part E. The procurement of these goods and/or services is restricted to the area of responsibility, and one of the areas nominated is Security Services, which is currently restricted to Campus Safety and Security. The University has amended this Schedule so that security projects are restricted to Information Technology Services where the project relates to only software and computer hardware and where building and construction work is involved then the security project is restricted to Capital Works and Facilities.

Section 4 of the Procurement Policy sets out the procedures to be followed as appropriate to the procurement method, and Part J of that section sets out the process to be followed for tenders. The University has amended the Procurement Policy to expressly deal with the use of external technical consultants where that expertise is not within the University or identified within another government agency. The amendment indicates that Specialist Consultants should only sit on Evaluation Panels in a technical advisory capacity, and for large or complex projects, consideration should be given to splitting tasks between Specialist Consultants to obtain a broader variety of views and advice.

Supporting material

- Procurement Policy (See Attachment A)
- Schedule 1 – Restricted Procurement Activities (See Attachment B)
- Preliminary Audit Scope - Preventative Maintenance Contract – Lifts/ Disabled Lifts (See Attachment C)

Evaluation of implementation (Progress update)

The University's Office of Audit & Risk Assessment has engaged an external firm to evaluate the effectiveness of the above changes and staff awareness of procurement requirements as well as associated policies. No security projects have been undertaken since the ICAC issued its report. The consultants are therefore auditing a major Capital Works & Facilities preventative maintenance contract approved in December 2014 to assess whether the project was undertaken in compliance with the ICAC recommendations. We expect the fieldwork for this work will be completed by the end of February with a final report being issued in March 2015.

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Recommendation 2.

That NSW government agencies embarking on new large-scale security projects adopt a rigorous product selection approach. The selection process could include:

- obtaining feedback regarding product specifications from a variety of sources, including end-users
- extensive product testing and the evaluation of test results by a panel either to inform the development of tender specifications or as part of a tender evaluation process.

Summary of progress

The recommendation is being: <tick one>

- Implemented as described in the report
- Implemented in an alternative way
- Partially implemented
- Not implemented

Action taken to implement recommendation

The University implemented a revised Procurement Policy effective from 2 December 2013. The Procurement Policy applies to all procurement undertaken at the University and was developed to conform to the New South Wales Government Guidelines on Procurement.

The revised Procurement Policy effective from 2 December 2013 applies to all procurement undertaken at the University. For projects (including security projects) with a value over \$250,000 a tender process is mandatory. Part L of the Procurement Policy requires that evaluation panels be established for all tender processes (clause 100). Part L also encourages a panel of stakeholders, experts and independents to assess various components or for probity purposes (clause 101).

The Capital Works & Facilities pre-tender process requires that meetings be held with stakeholders, and in the case of security projects that includes end-users such as University Security and Information Technology Services, to identify and prepare detailed product specifications for inclusion in the scope of works and Principal's Project Requirements.

Capital Works & Facilities requires tenderers to submit a Proof of Concept (**POC**) during the tender process for large projects including large security projects. The evaluation process in such cases involves two stages. The first stage is the formal evaluation of compliance, technical and price which leads to a short listing of tenderers. Those tenderers considered by the tender evaluation committee (**TEC**) to offer the best value for money are then invited to the second stage, the POC. In the POC step, participating tenderers demonstrate to the TEC that their equipment and software fulfils the requirements of the University with the expected level of functionality. The Tender Evaluation Report makes an assessment and includes it in its report on the second stage evaluation. Following the POC presentations, the University Technical Consultant, is asked to provide a technical report prior to any final recommendation being made.

Supporting material

- Procurement Policy (See Attachment A)
- Capital Works & Facilities tender process documents (See Attachment D)
- Preliminary Audit Scope - Preventative Maintenance Contract – Lifts/ Disabled Lifts (See Attachment C)

Evaluation of implementation (Progress update)

The Office of Audit & Risk Assessment has engaged an external firm to evaluate our procurement processes and this review will include checks of the tender processes as described above. No security projects have been undertaken since the ICAC issued its report. The consultants are therefore auditing a major Capital Works & Facilities preventative maintenance contract approved in December 2014 to assess whether the project was undertaken in compliance with the ICAC recommendations. We expect the fieldwork for this work will be completed by month end with a final report being issued in March 2015.

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Recommendation 3.

That NSW government agencies explore alternatives to relying exclusively on the advice of specialist consultants when selecting security integrators through a competitive process. Options for diluting the influence of specialist consultants include:

- identifying in-house security experts from other public sector agencies for tender evaluation panel participation
- ensuring that when consultants sit on tender evaluation panels, it is only in a technical advisory capacity
- identifying and seeking advice from agencies that have undertaken similar projects.

Summary of progress

The recommendation is being: <tick one>

- Implemented as described in the report
- Implemented in an alternative way
- Partially implemented
- Not implemented

Action taken to implement recommendation

As set out above, the University has implemented a revised Procurement Policy effective from 2 December 2013. Part A of the Procurement Policy sets out the core principles and requirements for procurement of goods and services at the University. Part F of the Procurement Policy authorises certain units to negotiate and secure contracts for particular goods and/or services on its behalf, such as those leading to mandated or preferred suppliers mentioned in Part E. The procurement of these goods and/or services is restricted to the area of responsibility, and one of the areas nominated is Security Services, which is currently restricted to Campus Safety and Security. The University has amended Schedule 1 – Restricted Procurement Activities so that security projects are restricted to Information

Technology Services where the project relates to only software and computer hardware and where building and construction work is involved then the security project is restricted to Capital Works and Facilities.

Section 4 of the Procurement Policy sets out the procedures to be followed as appropriate to the procurement method, and Part J of that section sets out the process to be followed for tenders. The University has amended the Procurement Policy to expressly deal with the use of external technical consultants where that expertise is not within either the University or identified within another government agency. The amendment indicates that Specialist Consultants should only sit on Evaluation Panels in a technical advisory capacity, and for large or complex projects, consideration should be given to splitting tasks between Specialist Consultants to obtain a broader variety of views and advice.

Supporting material

- Procurement Policy (See Attachment A)
- Schedule 1 – Restricted Procurement Activities (See Attachment B)
- Preliminary Audit Scope - Preventative Maintenance Contract – Lifts/ Disabled Lifts (See Attachment C)

Evaluation of implementation (Progress update)

The Office of Audit & Risk Assessment has engaged an external firm to evaluate the effectiveness of the above changes and staff awareness of procurement requirements as well as associated policies. No security projects have been undertaken since the ICAC issued its report. The consultants are therefore auditing a major Capital Works & Facilities preventative maintenance contract approved in December 2014 to assess whether the project was undertaken in compliance with the ICAC recommendations. We expect the fieldwork for this work will be completed by the end of February with a final report being issued in March 2015.

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Recommendation 4.

That NSW government agencies consider the feasibility of separating tasks between security consultants for large-scale and complex projects, in cases where specialist advice is required.

Summary of progress

The recommendation is being: <tick one>

- Implemented as described in the report
- Implemented in an alternative way
- Partially implemented
- Not implemented

Action taken to implement recommendation

As set out above, the University has implemented a revised Procurement Policy effective from 2 December 2013. The Procurement Policy refers to the Purchase and Tender Board Policy (effective from August 2012), which at clause 4 sets out that:

'the University will have a strategic approach to procurement and will have a Purchase and Tender Board to oversee all procurement activities undertaken by the University. The Purchase and Tender Board will be supported by specialist Tender Committees.'

Section 4 of the Procurement Policy sets out the procedures to be followed as appropriate to the procurement method, and Part J of that section sets out the process to be followed for tenders. The University has amended the Procurement Policy to expressly deal with the use of external technical consultants where that expertise is not within the University or identified within another government agency. The amendment indicates that Specialist Consultants should only sit on Evaluation Panels in a technical advisory capacity, and for large or complex projects, consideration should be given to splitting tasks between Specialist Consultants to obtain a broader variety of views and advice.

Supporting material

- Procurement Policy (See Attachment A)
- Purchase and Tender Board Policy (See Attachment E)
- Preliminary Audit Scope - Preventative Maintenance Contract – Lifts/ Disabled Lifts (See Attachment C)

Evaluation of implementation (Progress update)

The Office of Audit & Risk Assessment has engaged an external firm to evaluate the effectiveness of the changes to the University's Procurement Policy and staff awareness of procurement requirements. The reviewers will also assess whether tasks between consultants are being segregated where it is possible to do so.

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Recommendation 5.

That NSW government agencies adopt a broad approach to the due diligence enquiries that are conducted as part of a security procurement process, including:

- the scrutiny of low bids
- consideration of previous performance
- seeking referee reports beyond those nominated by the tenderer
- the verification of case studies provided by tenderers
- conducting criminal record checks on successful applicants
- seeking information from established information networks.

Summary of progress

The recommendation is being: *<tick one>*

- Implemented as described in the report
- Implemented in an alternative way
- Partially implemented
- Not implemented

Action taken to implement recommendation

Recommendation 5 will be implemented, except for the carrying out criminal checks as the University is not authorised to do so.

As set out above, the University has implemented a revised Procurement Policy effective from 2 December 2013. Clause 7 of the Procurement Policy states that:

'UWS seeks value for money in all procurement. Value for money is achieved in an open competitive environment in which suppliers can be confident that their proposals will be assessed on merit. It does not automatically mean "lowest price"; it incorporates and considers fitness for purpose; fair market price; return on investment; whole-of-life costs; timely delivery; post-delivery support; environmental

sustainability; social responsibility; evidence of previous performance or experience, effective warranty and conformity to law.'

Clause 90 in the Assessing Tender section of the Procurement Policy requires that:
'Evaluation panels should recommend acceptance of the tender that best meets the specification requirements and evaluation criteria (if developed), and the value for money principles outlined in Part A. The Evaluation Panel should provide justification in writing along with their recommendation to the delegate for approval.'

The University has added a requirement to the Procurement Policy that Evaluation Panels should also consider previous performance of suppliers, referee reports beyond those provided by the suppliers, verification of case studies and feedback from other Government or sector agencies when evaluating responses.

The University's Contract Development & Management Compliance Manual, which was released in 2013, provides staff with information and a guide on contract development and management. Section 4 deals with contract planning and development. Section 4.2.4 sets out that due diligence on potential suppliers is a critical starting point and should be an integral part of any tender or other selection process. Sections 4.2.5 - 4.2.9 set out the steps to be taken in any due diligence, including verifying the existence of the business and the ACN/ABN numbers through ASIC, bankruptcy and insolvency searches, credit checks through a credit search agency, checks of the Personal Property Security Register, obtaining copies of financial accounts and other organisational information from the other party directly (such as, approaches, techniques methods to products/service delivery, number of personnel, qualifications, whether they are employees or contractors, conducting checks of qualifications and experience), obtaining references and feedback from other clients or customers about track record and experience, reviewing industry, media and other reports (including by internet searches). Please note that conducting criminal record checks on successful applicants is not permitted by universities.

Supporting material

- Procurement Policy (See Attachment A)
- Contract Development & Management Compliance Manual (See Attachment F)
- Preliminary Audit Scope - Preventative Maintenance Contract – Lifts/ Disabled Lifts (See Attachment C)

Evaluation of implementation (Progress update)

An external firm has been engaged to evaluate the effectiveness of our processes as described above. The consultants are also auditing a major Capital Works & Facilities preventative maintenance contract approved in December 2014 to assess whether the project was undertaken in compliance with the ICAC recommendations. We expect the fieldwork for this work will be completed by the end of February with a final report being issued in March 2015.

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Recommendation 6.

That NSW government agencies adopt a preference for open tender methodologies (including staged processes that involve open expressions of interest) for new security installation projects above \$250,000 in value. For contracts up to \$250,000 in value, a minimum of three written quotes should be obtained, unless exceptional circumstances exist and are documented or the contract is worth \$30,000 or less.

This recommendation does not apply where whole-of-government or multi-agency arrangements are in place. It also does not apply where the agency has a pre-qualification scheme in place or where existing warrantee or integration issues preclude open competition.

Summary of progress

The recommendation is being: *<tick one>*

- Implemented as described in the report
- Implemented in an alternative way
- Partially implemented
- Not implemented

Action taken to implement recommendation

As set out above, the University has implemented a revised Procurement Policy effective from 2 December 2013. The Procurement Policy applies to all procurement undertaken at the University and has been developed to conform to the New South Wales Government Guidelines on Procurement.

Part B of the Procurement Policy sets out the Procurement Rules (clauses 28 - 35). The matrix in Table 1 defines the minimum requirements for procurement with graduated threshold dollar values and the minimum number of quotes required for each threshold.

Clause 25 sets out that the head of unit can seek more quotes or elect to call tenders for any process. The matrix sets out that tenders must be called for projects of more than \$250,000 in value.

Thresholds (excluding GST)	Minimum	Notes
Less than \$5K	No quote required	Use corporate card where possible
Less than \$30K (Consultants only - Account Code 7107)	1 written quote	One-off engagement of consultant. Attach copy of quote and other relevant information in Oracle I-Procurement.
More than \$5K to \$50K	3 written quotes	Attach copies of quotes and other relevant information in Oracle I-Procurement.
Less than \$150K (procurement of scientific equipment or accessories to match existing assets for research or teaching continuity or maintenance agreement with equipment OEM or sole agent)	1 written quote	Where supplier can be proven to be the only Australian agent for equipment. Attach copy of quote and proof of OEM or sole agency in Oracle I-Procurement.
More than \$50K to \$250K	3 written quotes and submission to the Associate Director, Procurement or as per Clause 67.	Use UWS pro-formas and complete a procurement plan prior to procurement action commencing. Attach copies of quotes and other relevant information in Oracle I-Procurement.
More than \$250K	Tenders called	

Clause 77 of the Procurement Policy sets out the benefits of open tender processes so that any potential supplier can submit a tender and to test the open market.

Supporting material

- Procurement Policy - in particular Table 1 Procurement Matrix (See Attachment A)
- Preliminary Audit Scope – Administrative Audit Program (See Attachment G)
- Feedback Results – iManager Training Sessions (See Attachment H)

Evaluation of implementation (Progress update)

The cyclical Administrative Audit Program is continuing. Outcomes of our reviews are being reported to our Audit & Risk Management Committee. No significant non-compliance issues identified to-date.

Our Corruption Prevention Training sessions (undertaken as part of a mandatory professional development course for all supervisors and managers) continues. Staff are engaging with these deliveries and feedback results indicate a high level of satisfaction with the overall program.

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Recommendation 8.

That NSW government agencies improve their project management systems by:

- clarifying project roles and responsibilities
- developing in-depth project scopes and plans, as appropriate, to the size and complexity of a project
- specifying and ensuring compliance with contract terms and conditions
- introducing tight inventory controls
- close monitoring of project budgets and project expenditure
- establishing processes to verify and approve variations, including the use of quantity surveyors.

Summary of progress

The recommendation is being: <tick one>

- Implemented as described in the report
- Implemented in an alternative way
- Partially implemented
- Not implemented

Action taken to implement recommendation

As part of our Governance structure, Capital Works and Facilities (**CW&F**) has developed and documented a project management methodology to manage projects, referred to as the Five Stage Phase Review Process. This includes a financial and technical review process, which CW&F reviews annually and benchmarks against industry standards to enable the process to be continuously improved.

The Five Stage Phase Review Process requires that each project equal to or over \$2 million in value has a Project Control Group (**PCG**) which meets monthly, as well as weekly site meetings for projects under \$2 million. Compliance with the terms and conditions of contracts are monitored at these meetings. Any issues or matters of concern are referred to

the Procurement, Tendering and Legal Officer for review and resolution. Budgets and expenditure are monitored by:

- a) a monthly Project Steering Committee for projects that are \$2 million or more at which the Quantity Surveyor attends and reports;
- b) a monthly PCG meeting attended by the head contractor who is contractually obligated to report on the status of the project;
- c) a monthly status report that is prepared by the CW&F Senior Project Manager; and
- d) CW&F daily reviews of project cash flows and expenditure.

Prior to sending variations to the Quantity Surveyor, the Superintendent and Project Manager review and check the requested variation. On all major projects that are \$2 million or greater, an independent quantity surveying firm is engaged to ensure an objective analysis and confirmation as to compliance and certification that the variation is fair and reasonable.

Information Technology Services (**ITS**) uses the Prince 2 project management methodology, initially developed by the UK government agency Office of Government Commerce. Based on the Prince 2 system, ITS has developed a Project Delivery Methodology to manage all projects including any security projects.

The University's Contract Development & Management Compliance Manual, which was released in 2013, provides staff with information and a guide on contract development and management. Section 4 deals with contract planning and development and covers resourcing, relationships, contract deliverables, monitoring and measuring performance, contract pricing, contract payments, and conflicts of interest. Section 6 deals with contract management and covers contract management generally, contractor/supplier performance, systems, changes to circumstances or requirements. Section 7 deals with contract termination or expiry and the management of related risks, such as outstanding contract obligations, transitioning out, evaluating contract performance and management, record-keeping and final payments and additional costs or disputes.

Supporting material

- Capital Works & Facilities Phase Review documents, including technical and financial review, and steering group project template documents (See Attachment I)
- ITS Project Delivery Methodology based on Prince 2 (See Attachment J)
- University's Contract Development & Management Compliance Manual (See Attachment F)
- Preliminary Audit Scope - Preventative Maintenance Contract – Lifts/ Disabled Lifts (See Attachment C)

Evaluation of implementation (Progress update)

The University's Office of Audit & Risk Assessment has engaged an external firm to review a major procurement project. This review will include checks to determine whether the project methodology used complies with this Recommendation 8. The review will also identify and recommend any improvements to be made to the project methodology to be used in future projects. The auditors will also interview key staff on the project under review to assess their level of understanding of these project management requirements. Outcomes will in turn be reported to

the University Executive and the University Audit & Risk Management Committee. We expect this work will be completed in March 2015.

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Recommendation 9.

That NSW government agencies ban employees directly involved in procurement activities from accepting any gifts, benefits and hospitality from potential contractors and consultants and existing contractors and consultants.

Summary of progress

The recommendation is being: <tick one>

- Implemented as described in the report
- Implemented in an alternative way
- Partially implemented
- Not implemented

Action taken to implement recommendation

The University has clear policies and guidelines to avoid and/or manage the potential acceptance of any gifts, benefits and hospitality from existing or potential contractors and consultants. The relevant University policies and guidelines include:

- Procurement Policy;
- Conflict of Interest Policy;
- Gifts and Benefits Acceptance and Management Policy; and
- Gifts and Benefits Reporting and Registration Procedures.

Below is an overview of the University's approach -

The Procurement Policy states:

- at clause 13 that - *'employees involved in procurement actions are prohibited from accepting gifts or extensive hospitality or other benefits from current or prospective suppliers. Modest hospitality (e.g. in house lunch, coffee, tea) associated with meetings to discuss goods and/or services being acquired by the University is acceptable but restaurant lunches and dinners, the provision of alcohol, tickets to the theatre or sporting events are not.'*

- at clause 14 that – *‘while it is legitimate, as part of the procurement process, to travel to view prospective goods or services, such as equipment, situations where the potential supplier pays for such travel and associated accommodation should be avoided.’*
- at clause 15 that – *‘where there is confusion or difficulties surrounding proffered gifts and/or other benefits the Associate Director, Procurement should be consulted. The Gift and Benefit Acceptance Management Policy can also be used as a reference.’*

The University’s Conflict of Interest Policy states:

- at clause 5 that - *‘conflicts of interest or perceived conflicts of interest must be declared and managed to ensure integrity and transparency’.*
- at clause 30 - *‘the giving and receiving of gifts and/or benefits is potentially problematic and should be handled in accordance with the University's Gift and Benefit Acceptance and Management Policy.’*

The Gift and Benefit Acceptance and Management Policy sets out at clause 16 that:

‘The best method for avoiding compromising situations is to forgo participation in any transaction or activity that may be perceived as corrupt or unethical. Accordingly the University applies the following general principles to the acceptance of gifts and/or benefits.

- a) As a general rule and wherever practical, employees should decline acceptance of any gift(s) and/or benefit(s).*
- b) An employee must not accept a gift and/or benefit that could reasonably be perceived as having been provided with the intent of influencing the employee in carrying out their duties with the University.*
- c) Transparent processes are in themselves a defence against allegations of corruption, therefore the University requires that employees report offers of gifts and/or benefits and the outcome of such incidents (i.e. acceptance/refusal of gift/benefit). See the Gift and Benefit Reporting and Registration Procedures.’*

The Gift and Benefit Reporting and Registration Procedures outline the requirements for staff to report gifts or benefits they have received or accepted in accordance with the Gift and Benefit Acceptance and Management Policy.

Supporting material

- Conflict of Interest Policy (See Attachment K)
- Gifts and Benefits Acceptance and Management Policy (See Attachment L)
- Gifts and Benefits Reporting and Registration Procedures (See Attachment M)
- Feedback Results – iManager Training Sessions (See Attachment H)

Evaluation of implementation (Progress update)

Our quarterly corruption prevention training sessions with supervisors and managers is continuing. This training forms part of a professional development course that is mandatory for supervisors and managers. These 90 minute training sessions include gifts and benefits case studies and cover the need for staff to comply with our Code of Conduct, Gifts and Benefits Acceptance and Management Policy and Procurement Policy. Staff who attend this training complete evaluation sheets at the conclusion of each session and it appears they are engaging with the program.

We are also continuing to provide corruption prevention training to staff in Capital Works & Facilities **(CW&F)**. – The University’s Office of Audit & Risk Assessment has also received a request from this department to undertake induction training with recently appointed staff. This training takes approximately 2 hours per session and focuses on probity and procurement issues. Staff will be asked to complete evaluation sheets at the conclusion of the session. The Office of Audit & Risk Assessment will review the feedback to assess staff understanding of probity requirements and will make any appropriate adjustments to the program if necessary.

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Recommendation 10.

That NSW government agencies be proactive in explaining the obligations on contractors and consultants to declare conflicts of interest, including those arising from either a pecuniary or non-pecuniary relationship.

Summary of progress

The recommendation is being: *<tick one>*

- Implemented as described in the report
- Implemented in an alternative way
- Partially implemented
- Not implemented

Action taken to implement recommendation

Pursuant to the University's Procurement Policy all parties involved in tender processes on the University's behalf, both internal and external, must complete a formal 'no interest' declaration, which is placed on the TRIM file (clause 11 and clause 80).

It is a requirement for all Capital Works & Facilities tenderers to complete a Statutory Declaration including that the tenderer has not engaged in collusive tendering nor cover bidding (Form D2). As part of the tender process for Capital Works & Facilities projects, tenderers are required to complete a schedule, 'Conflicts of Interest and Fair Dealing' (Form D9). The form sets out the University's requirements, explains the obligations of the tenderer and requires disclosure of potential conflicts of interest.

The University's Statement of Business Ethics for Suppliers and Service Providers specifically addresses conflicts of interest and requires that any existing, potential or perceived conflicts be declared to the University manager handling the engagement. This is referred to on the University Purchase Order. In August 2014, a copy was also sent to suppliers with whom the University spends over \$5000 per annum

The University has amended the External Supplier Purchase or Work Order Standard Terms and Conditions to expressly require compliance with the Statement of Business Ethics for Suppliers and Service Providers.

Supporting material

- Procurement Policy (See Attachment A)
- Statement of Business Ethics for Suppliers and Service Providers (See Attachment N)
- Forms D2 and D9 in Request for Tender documents (See Attachment O)
- External Supplier Purchase or Work Order Standard Terms and Conditions (See Attachment P)
- Preliminary Audit Scope - Preventative Maintenance Contract – Lifts/ Disabled Lifts (See Attachment C)

Evaluation of implementation (Progress update)

The University's Office of Audit & Risk Assessment has engaged an external firm to review a major procurement project. This review will include checks to determine whether 'no interest' declarations have been completed and placed in the University records system (TRIM). We expect this review will be completed in March 2015.

The Office of Audit & Risk Assessment can confirm that the August 2014 distribution of the University's Statement of Business Ethics for Suppliers and Service Providers had been completed.

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Recommendation 11.

That NSW government agencies ensure compliance with the Department of Premier and Cabinet's *Guidelines for the Engagement and Use of Consultants (C2004-17)* when engaging and using consultants.

Summary of progress

The recommendation is being: *<tick one>*

- Implemented as described in the report
- Implemented in an alternative way
- Partially implemented
- Not implemented

Action taken to implement recommendation

The University's Procurement Policy has been developed to conform to the New South Wales Government Guidelines on Procurement. The University has amended the Procurement Policy to expressly deal with the use of external technical consultants where that expertise is not within either the University or identified within another government agency. The amendment sets out that Specialist Consultants should only sit on Evaluation Panels in a technical advisory capacity, and for large or complex projects consideration should be given to splitting tasks between Specialist Consultants to obtain a broader variety of views and advice.

Supporting material

- Procurement Policy (See Attachment A)

Evaluation of implementation (Progress update)

The University's Office of Audit & Risk Assessment has engaged an external firm to review a major procurement project. This review will include checks to determine whether the University's Procurement Policy conforms to the New South Wales Government *Guidelines for the*

Engagement and Use of Consultants (C2004-17). We expect this review will be completed in March 2015.