

The University of Sydney plan of action in response to recommendations made in *Investigation into the over-payment of public funds by the University of Sydney for security services (Operation Gerda)*

PART A: The University of Sydney's response to corruption prevention recommendations

Firstly please indicate the response to be taken for each recommendation made.

Recommendation 1:

That the University ensures that key tender documentation, such as procurement strategies, tender evaluation plans and tender evaluation committee (TEC) reports, include a realistic and detailed assessment of procurement and contract risks. This assessment should be conducted in a manner that incorporates operational risks and complies with the risk management principles in the International Standard on Risk Management ISO 31000:2018.

Please indicate the response the public authority will take in its plan of action:

- Implement the recommendation as described in the report
- Implement the intent of the recommendation in an alternative way
- Partially implement the recommendation
- Not implement the recommendation

If the action USYD intends is other than "implement the recommendation as described in the report", please state the proposed action to be undertaken in the space provided below.

Please explain why the above action is proposed rather than the ICAC's published recommendation.

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Recommendation 2:

That the University amends its *Guidelines for using the risk assessment tool* to provide more detailed guidance on major contract risks.

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Recommendation 3:

That the University assesses contract assurance frameworks that cover key risks involved in the provision of services, such as a reliance on subcontracting, when assessing the capability and capacity of tenderers.

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Recommendation 4:

That the chief procurement officer formally reviews requests for tender (RFTs) for high-risk tenders and tender evaluation plans for significant procurement undertakings.

Please indicate the response the public authority will take in its plan of action:

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Please explain why the above action is action is proposed rather than the ICAC’s published recommendation.

Recommendation 5:

That the University should review its tender assessment criteria and weightings to avoid perceptions that unwarranted advantages are provided to a particular tenderer.

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Recommendation 6:

That probity walls and/or other safeguards should be established where there is a risk that someone connected to a tenderer could access confidential information about a tender process and tenderers' submissions.

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Recommendation 7:

That the University should ensure consistency across its tender documentation concerning how tenders will be evaluated.

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Please explain why the above action is action is proposed rather than the ICAC’s published recommendation.

Recommendation 8:

That the University should continue to assess all tenderers and, where relevant, their supply chains to ensure compliance with Awards.

Please indicate the response the public authority will take in its plan of action:

- Implement the recommendation as described in the report
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Recommendation 9:

That all TEC chairs and/or appointed probity advisers should ensure that tender scoring methodologies are clear to evaluators and that the tender assessment criteria have been followed.

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- Implement the recommendation as described in the report
- Implement the intent of the recommendation in an alternative way
- Partially implement the recommendation
- Not implement the recommendation

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Please explain why the above action is action is proposed rather than the ICAC’s published recommendation.

Recommendation 10:

That tender reports to the Finance and Audit Committee (FAC) and the tender board should contain adequate information to enable key issues to be understood. The information should include:

- tenders’ assessment criteria scores
- key contract risks and their mitigation
- key assumptions
- any significant probity concerns and the manner in which they were resolved.

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- Partially implement the recommendation
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Recommendation 11:

That the University should ensure all future contracts for the provision of security services include adequate provisions covering:

- subcontracting terms

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- **contractor assurance frameworks**
- **right-to-audit clauses**
- **timesheet access**
- **technology requirements.**

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- Partially implement the recommendation
- Not implement the recommendation

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Please explain why the above action is action is proposed rather than the ICAC’s published recommendation.

Recommendation 12:

That security contractors should be required to provide evidence that they have properly implemented internal controls to ensure that security staff (including subcontractors) have completed their duties in accordance with the contract and work orders.

Please indicate the response the public authority will take in its plan of action:

- Implement the recommendation as described in the report
- Implement the intent of the recommendation in an alternative way
- Partially implement the recommendation
- Not implement the recommendation

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Recommendation 13:

That the University should document its internal contractor controls. A report of the conduct of the controls, exceptions to the controls and the resolution of those exceptions should be given to relevant managers in CIS.

Please indicate the response the public authority will take in its plan of action:

- Implement the recommendation as described in the report
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- Partially implement the recommendation
- Not implement the recommendation

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Please explain why the above action is action is proposed rather than the ICAC’s published recommendation.

Recommendation 14:

That the University should perform random checks that security guards are on duty. These could include GPS monitoring, reviewing CCTV and access records, and surprise visits to certain locations.

Please indicate the response the public authority will take in its plan of action:

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Please explain why the above action is action is proposed rather than the ICAC’s published recommendation.

Recommendation 15:

That there should be a regular rotation between at least two University employees who undertake contractor checks to ensure that security services are provided.

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- Implement the intent of the recommendation in an alternative way
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Please explain why the above action is action is proposed rather than the ICAC’s published recommendation.

Recommendation 16:

That the University should have access to guard timesheets. The University should also inspect the timesheets to ensure compliance with legislative requirements and the contract, and to help confirm charges on invoices.

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Recommendation 17:
That security contractors should be required to provide specimen signatures against which the signatures of guards should be checked.

Please indicate the response the public authority will take in its plan of action:

- Implement the recommendation as described in the report
- Implement the intent of the recommendation in an alternative way**
- Partially implement the recommendation
- Not implement the recommendation

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The university has applied superior management control to identity management of security contracted staff, which includes specimen signatures as part of the control.

Please explain why the above action is action is proposed rather than the ICAC’s published recommendation.

The University has applied an improved identity management application, which does record and check electronically specimen signatures against each security contracted staff profile, as one of the assurances controls. The Biometric has been applied against each security contractor employee and requires log in and log out per shift, which is the mapped against the roster and hours worked. This provides improved identity assurance and is a superior control, than checking each signature against each timesheet.

Recommendation 18:
That the University should have key performance indicators (KPIs) in place that cover the essential requirements for the provision of security services. It should also ensure KPI monitoring for security contracts is based on data that is trustworthy, measurable and relevant, and that reliance on contractor self-reporting is minimalised.

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Recommendation 19:

That the University should develop controls to identify when contract variations exceed 10% of the original contract amount. It should also clarify that a sufficiently senior delegate is required to scrutinise and approve cumulative ad hoc contract payments that exceed 10% of the contract value.

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In regard to the Operations Services Agreement, any variation regardless of the value are quantified and verified by the principal’s representative.

The University’s UniBuy system provides the controls to manage spend against contracts without the need to allow tolerances for variations.

Please explain why the above action is action is proposed rather than the ICAC’s published recommendation.

In regard to the Operations Services Agreement, the FAC approved contracts value can’t be exceeded unless FAC and Vice Chancellor endorse, in accordance to University Delegations of Authority (DOA). Once a contract with a value over \$250,000 excluding GST is executed the approved estimated or fixed value is entered into the system. When purchase orders are raised against the contract they are accumulated and deducted from the approved value. Once the funds have been expended the contract is automatically closed and no further spend is permitted. To re-open the contract a variation must be approved by the appropriate financial delegate for the total accumulated value of the contract. No tolerances are permitted under the delegations of authority.

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Recommendation 20:

That the University considers sharing some contract management duties between internal staff, who are co-located with security contractors, and staff, who do not have day-to-day contact with security contractors.

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Recommendation 21:

That the University should develop a code of business practice or similar document and contractually bind major suppliers to comply with it. The document should include:

- **a prohibition on suppliers or potential suppliers offering gifts and benefits**
- **a prohibition on actions that place University staff or other individuals in the supply chain in conflict of interest situations**
- **a requirement for suppliers to have comparable provisions in contracts with subcontractors or other companies in the supply chain**
- **details of where people can make reports (including anonymous reports) of breaches of the code of business practice.**

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Recommendation 22:

That the University should establish a clear mechanism, and one that is clearly communicated, for the staff of suppliers and subcontractors to report corrupt conduct.

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Recommendation 23:

That the University adopts a fraud and corruption control plan that appropriately addresses the risks of fraud and corruption. Among other things, the plan should reflect the findings made in previous Commission investigation reports concerning universities and ensure that the corruption prevention issues are not dealt with in isolation, but that the cumulative implications are properly considered.

Please indicate the response the public authority will take in its plan of action:

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Recommendation 24:

That all internal audit reports should be given to the director of internal audit and reported to the FAC. The internal audits should be reviewed by an internal audit manager to assess the implications of the report and whether there are red flags of possible fraud and corruption. If necessary, internal auditors’ working papers should also be obtained.

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PART B: The University of Sydney's plan of action

In this section, please provide details of USYD's plan of action in relation to the recommendations and/or proposed actions described above.

The scope and scale of recommendations made in investigation reports varies considerably, and the ICAC recognises a single template may not suit every agency or investigation. In view of this, USYD is invited to develop a format that is appropriate for the proposed plan of action and subsequent report(s).

The ICAC asks that its corruption prevention representative named in the cover letter is consulted if USYD decides to develop its own reporting format. The ICAC corruption prevention representative will advise if the plan or report format has the ICAC's endorsement.

If USYD prefers to adhere to an established format, the following may be used as a guide:

Plan of action

Each specific recommendation or proposed action
Action to be taken describing activities, allocating responsibility, measures to be used

Recommendation 1:

That the University ensures that key tender documentation, such as procurement strategies, tender evaluation plans and tender evaluation committee (TEC) reports, include a realistic and detailed assessment of procurement and contract risks. This assessment should be conducted in a manner that incorporates operational risks and complies with the risk management principles in the International Standard on Risk Management ISO 31000:2018.

Action to be taken describing activities, allocating responsibility, measures to be used

Background

The University has adopted a tiered approach to assessment and documentation requirements when purchasing goods or services, based around the value of the purchase.

Preferred suppliers

The University has a range of preferred suppliers who have been appointed through a University Procurement Services-led competitive process, such as an open Request for Tender. Each preferred supplier is subject to a master contract agreement detailing the terms and conditions of supply.

Wherever possible, University staff are encouraged to place orders for goods and services through one of the University's preferred suppliers. Where University staff choose not to use the University's preferred supplier the purchase is automatically directed to the UniBuy Desk (procurement help desk) who assess and document reasons for choosing a non-preferred supplier.

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Quotation or tendering process

For goods or services where the University does not have a preferred supplier, University staff obtain quotes or follow a tendering process, applying the thresholds noted below:

Value of goods/services

Requirement/channel

Less than \$5,000 (excl GST)

Corporate card, if infrequent and not in UniBuy catalogue

\$0 to \$29,999 (excl GST)
(Simple buying)

Obtain at least **one** written quote

\$30,000 to \$249,999 (excl GST)
(Comprehensive buying)

Obtain at least **three** written quotes

\$250,000 (excl GST) and above
(Tailored sourcing)

Must go through a tendering process

This background is relevant to Recommendations 1; 2; 3; 4; 5; 6; 7; 8; 9; and 10. These recommendations all relate to **tender** processes (which may include a Request for Quote, Request for Proposal, Request for Tender or a multi-stage event). As outlined above, the University uses tender processes for preferred suppliers and/or for purchases of goods or services with a value of \$250,000 or more (excluding GST). The University's responses to Recommendations 1 to 10 relate to the documentation and assessments used in its tender processes.

Recommendation 1 response

For all tender processes, the University uses a range of key document templates provided to sourcing specialists, designed to address the University's key risks. The listing below outlines these documents, following the process-flow of a typical tender:

- **Risk Evaluation Framework** to assess the risks to be addressed during the tender process
- **Procurement Strategy**, supported by External Interest Declarations and Confirmation of Funding
- **Probity Questionnaire** to assist in assessing whether a Probity Adviser is required and to document the final decision
- **Complexity Matrix** to assist in assessing whether the Request for Tender and the Tender Evaluation Plan should be referred to the Chief Procurement Officer, for review and approval
- **Request for Tender** with generic and project-specific questions covering risk areas for all projects, for example, sub-contracting and ethical practice. This document also includes the University's **Conditions of Tendering**
- **Tender Evaluation Plan**. This document establishes evaluation criteria and weightings and includes **Scoring Guidelines**
- **Tender Evaluation Charter**. This document includes matters relating to the management of evaluations.
- **Tender Evaluation Report** which details the outcome of the evaluation process and recommends the award

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- **Approval to Award** which outlines the procurement process and the outcome of the evaluation for approval under established governance and the University's Delegations of Authority (where approval is not required from the Finance and Audit Committee)
- Finance and Audit Committee **Paper**, (via the University Executive) where required by the University's Delegations of Authority.

The University has updated its templates to ensure that key tender documentation, such as the Procurement Strategy, Tender Evaluation Plan and Tender Evaluation Report, require staff running the tender process to include a realistic and detailed assessment of procurement and contract risks.

The Risk Evaluation Framework template has been designed to ensure that the assessment of procurement and contract risks by the staff running the tenders will include operational risks. The Risk Evaluation Framework template has been developed in collaboration with the University's Chief Risk Officer, and is aligned with the University's Risk Management Framework and Risk Appetite and Tolerance Statement which comply with the risk management principles in the International Standard on Risk Management ISO 31000:2018. The Risk Evaluation Framework was implemented in late 2019 and made a mandatory step in the tendering process with effect from January 2020 following training for the procurement team members.

All guidance and training material is stored in a Knowledge Library in UniBuy and is therefore available for existing and new team members. An onboarding training package is being developed for new starters which will be mandatory.

Ultimate responsibility: Chief Procurement Officer

Effective date: Risk evaluation framework – for tenders commencing 1 January 2020

Effective date: Other templates – for tenders commencing 1 June 2020

Recommendation 2:

That the University amends its *Guidelines for using the risk assessment tool* to provide more detailed guidance on major contract risks.

Action to be taken describing activities, allocating responsibility, measures to be used

Background

Please refer to the Background outlined in Recommendation 1.

Recommendation 2 response

As part of the key documents outlined in the response to Recommendation 1, the University requires staff running tender processes to complete a Risk Evaluation Framework document to ensure that major contract risks are considered and assessed. The Risk Evaluation Framework, supported by Risk Assessment Guidelines, was updated in October 2019 to provide more detailed guidance on major contract risks, together with training for the procurement team facilitated by Office of General Counsel and the Chief Risk Officer. Ongoing training will be provided to the procurement team to maintain the quality of risk assessments as a key part of the sourcing process.

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Ultimate responsibility: Chief Procurement Officer
Effective date: Tenders commencing 1 April 2020

Recommendation 3:

That the University assesses contract assurance frameworks that cover key risks involved in the provision of services, such as a reliance on subcontracting, when assessing the capability and capacity of tenderers.

Action to be taken describing activities, allocating responsibility, measures to be used

Background

Please refer to the Background outlined in Recommendation 1.

Recommendation 3 response

As outlined in the response to Recommendation 1, the University uses a range of key document templates provided to sourcing specialists in tender processes, designed to address the University's key risks. The key risks include the need for tenderers to agree to an appropriate contract assurance framework that covers key risks involved in the provision of services, such as a reliance on subcontracting. These key risks are initially captured when the Risk Evaluation Framework is completed.

Relevant key documents used by the University to assess the capability and capacity of tenderers in addressing these key risks include the:

- Risk Evaluation Framework which identifies and assesses risks to be addressed during the sourcing process.
- Request for Tender, which includes generic and project-specific questions covering risk areas for all projects including for example sub-contracting and ethical practice.
- Tender Evaluation Report, which includes assessments of the contract assurance frameworks outlined by tenderers in their submissions.
- University contract templates have been enhanced to reflect risk areas including ethical practice and sub-contracting. The University's standard contract templates provide that primary vendors seek approval from the University before appointing a sub-contractor and a clear expectation that the primary vendor is responsible for the actions and performance of its sub-contractors.
- Contract Management Framework which provides guidance for contract managers managing risk during the course of the contract - and in the tiering of contracts on the basis of risk to determine the level of management required.

Contract tiering will occur towards the end of the sourcing activity, when sourcing staff and the contract owner within the business unit will establish a contract 'risk' review that will ultimately determine how the contract will be managed post award. In addition, all contract managers across the University Operations portfolio are attending mandatory contract management training conducted by a qualified third party.

Ultimate responsibility: Chief Procurement Officer
Effective date: December 2020

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Recommendation 4:

That the chief procurement officer formally reviews requests for tender (RFTs) for high-risk tenders and tender evaluation plans for significant procurement undertakings.

Action to be taken describing activities, allocating responsibility, measures to be used

Background

Please refer to the Background outlined in Recommendation 1.

Recommendation 4 response

As outlined in the response to Recommendation 1, the University uses a range of key document templates provided for use by the procurement team in tender processes, which are designed to address the University's key risks. One of these documents is a Complexity Matrix which, based on assessed level of risk and value of the project, determines complexity of the tender.

If the outcomes of the Complexity Matrix indicate that the tender has a high risk or high value (requiring financial approval by the Finance and Audit Committee), the Request for Tender and the Tender Evaluation Plan documentation is submitted to the Chief Procurement Officer for formal review and approval.

Ultimate responsibility: Chief Procurement Officer

Effective date: Tenders commencing end August 2020

Recommendation 5:

That the University should review its tender assessment criteria and weightings to avoid perceptions that unwarranted advantages are provided to a particular tenderer.

Action to be taken describing activities, allocating responsibility, measures to be used

Background

Please refer to the Background outlined in Recommendation 1.

Recommendation 5 response

As outlined in the response to Recommendation 1, the University uses a range of key document templates provided to sourcing specialists in tender processes, designed to address the University's key risks.

The Risk Evaluation Framework has been updated to specifically flag the risk of incumbent advantage, so that staff involved in the tender process can ensure that tender assessment criteria and weightings avoid the perception that unwarranted advantages are provided to a particular tenderer.

Tender Evaluation Committees are comprised of individuals with the most comprehensive knowledge of the goods and services being sourced. This may mean that a contract manager is included on the team, subject to disclosing conflicts of interest and, where required, entering into a Conflict Management Plan. An element of the procurement lead's

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role is managing the probity and fairness of the procurement process, including undue influence brought to bear on Committee members.

This is complemented by:

- The Procurement Strategy, which has been updated to require high level risks and tender evaluation criteria to be identified
- The Probity Questionnaire, which includes specific consideration of whether the risk or circumstances involved in the tender require the appointment of an independent Probity Adviser to avoid any perception of bias or favouritism.

Ultimate responsibility: Chief Procurement Officer

Effective date: Revised Procurement Strategy tenders commencing 1 January 2020

Effective date: Probity Questionnaire tenders commencing 1 August 2020

Recommendation 6:

That probity walls and/or other safeguards should be established where there is a risk that someone connected to a tenderer could access confidential information about a tender process and tenderers' submissions.

Action to be taken describing activities, allocating responsibility, measures to be used

Background

Please refer to the Background outlined in Recommendation 1.

Recommendation 6 response

The University has a range of processes to identify whether staff or contractors involved in a tender process could have a conflict of interest, such as being connected to a tenderer, so that appropriate measures such as probity walls and/or other safeguards can be put in place to ensure that they cannot access confidential information about the tender process and/or the tenderers' submissions.

At an overarching level, the University's Procurement Policy requires every person undertaking procurement activities to behave ethically and to monitor, report and manage any actual, apparent or perceived conflicts of interests. This requirement is complemented by the University's External Interests Policy.

At an individual tender level, the Procurement Strategy document requires completion of External Interest Declarations flagging any actual, apparent or perceived conflicts of interest. This is complemented by the Tender Evaluation Charter, which highlights the need to disclose conflicts of interest and must be formally acknowledged by all the members of the Tender Evaluation Committee.

The University's tender processes are supported by procurement personnel whose training includes awareness of the need to ensure that probity walls and/or other safeguards are put in place where there is a risk that someone connected to a tenderer could access confidential information about a tender process and tenderers' submissions. Where conflicts of interest are identified, the individuals involved are either excluded from the tender process or an appropriate Conflict Management Plan is prepared and monitored by the procurement lead.

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Ultimate responsibility: Chief Procurement Officer
Effective date: Tenders commencing 1 April 2020

Recommendation 7:

That the University should ensure consistency across its tender documentation concerning how tenders will be evaluated.

Action to be taken describing activities, allocating responsibility, measures to be used

Background

Please refer to the Background outlined in Recommendation 1.

Recommendation 7 response

As outlined in the response to Recommendation 1, the University uses a range of key document templates, which are provided to procurement personnel for use in tender processes, designed to address the University's key risks. The University has reviewed and updated these document templates to ensure consistency across its tender documentation concerning how tenders will be evaluated. Relevant documents which have been updated include the:

- Request for Tender, incorporating The Conditions of Tendering, reviewed in June 2020
- Tender Evaluation Plan, including Scoring Guidelines, reviewed in November 2019
- Tender Evaluation Charter, including matters relating to the management of evaluations, reviewed in November 2019.

In particular, the Tender Evaluation Charter establishes a consistent approach to the evaluation of tenders, providing guidance on:

- Principles of an evaluation
- Management of the tender evaluation
- Arrangements to ensure confidentiality, fairness and probity
- Roles and responsibilities of Tender Evaluation Committee members
- Tender evaluation criteria – guidance around types of criteria, setting and evaluating
- The evaluation process and methodology – steps in the process, management of late and alternative tenders
- Recommendation and approval – how the recommendation of the Committee is taken forward for approval
- Notifications and contract negotiations – the appropriate time to notify tenderers of the outcome, finalising contract matters and debriefing unsuccessful respondents.

Ultimate responsibility: Chief Procurement Officer
Effective date: Tenders commencing 1 July 2020

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Recommendation 8:

That the University should continue to assess all tenderers and, where relevant, their supply chains to ensure compliance with Awards.

Action to be taken describing activities, allocating responsibility, measures to be used

Background

Please refer to the Background outlined in Recommendation 1.

Recommendation 8 response

As outlined in the response to Recommendation 1, the University uses a range of key document templates provided to sourcing specialists in tender processes, designed to address the University's key risks. This includes the risk that all tenderers and, where relevant, their supply chains ensure compliance with Awards. Relevant key documents include the:

- Risk Evaluation Framework identifying compliance with Awards as a risk where appropriate
- Request for Tender with generic and project-specific questions covering risk areas for all projects including sub-contracting and ethical practice. There are also specific requests for information regarding relevant Industrial Awards and the tenderer's history in complying with the Awards.
- Tender Evaluation Plan which highlights the approach taken during the procurement process to review the tenderer's submitted rates in labour-based contracts against relevant Industrial Awards.
- Tender Evaluation Report outlining the University's assessment of the submissions and representations made by the tenderers.

In addition, training will be provided to the procurement team to enable them to identify circumstances in which labour-based services require validation against awards and processes and approaches to use.

Ultimate responsibility: Chief Procurement Officer

Effective date: Tenders commencing 1 September 2020

Recommendation 9:

That all TEC chairs and/or appointed probity advisers should ensure that tender scoring methodologies are clear to evaluators and that the tender assessment criteria have been followed.

Action to be taken describing activities, allocating responsibility, measures to be used

Background

Please refer to the Background outlined in Recommendation 1.

Recommendation 9 response

Each Tender Evaluation Committee (TEC) is led by procurement personnel, with training in tender processes and awareness of the need to ensure that the tender scoring methodologies are clear to evaluators and that the tender assessment criteria have been

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followed. In the case of very complex or sensitive tenders, the procurement lead may be supported by an independent probity adviser engaged by the University.

As outlined in the response to Recommendation 1, the University uses a range of key document templates provided to sourcing specialists in tender processes, designed to address the University's key risks. Relevant documents include the:

- Tender Evaluation Plan which includes evaluation criteria and weightings and Scoring Guidelines
- Tender Evaluation Charter which includes guidance around the tender evaluation criteria and the evaluation process and methodology. All members of the Tender Evaluation Committee must formally acknowledge this Charter.
- Tender Evaluation Report.

Ultimate responsibility: Chief Procurement Officer
Effective date: Tenders commencing 1 September 2020

Recommendation 10:

That tender reports to the Finance and Audit Committee (FAC) and the tender board should contain adequate information to enable key issues to be understood. The information should include:

- **tenders' assessment criteria scores**
- **key contract risks and their mitigation**
- **key assumptions**
- **any significant probity concerns and the manner in which they were resolved.**

Action to be taken describing activities, allocating responsibility, measures to be used

Background

Please refer to the Background outlined in Recommendation 1.

Recommendation 10 response

Once the tender process has been conducted and the Tender Evaluation Report has been produced, the recommendations are documented in the Approval to Award and submitted to the University's Tender Board for review and approval. The Approval to Award summarises the procurement process, evaluation outcomes (including scores for each tenderer) and identifies residual risks for handover to the Contract Manager. For high-value contracts which require approval by the University's Finance and Audit Committee under the University's Delegations of Authority, a submission is prepared for approval.

The content of reports to the Finance and Audit Committee has been enhanced to ensure it is comprehensive and contains adequate information to enable key issues to be understood, including:

- A summary of the procurement process including the stages of the process (e.g. Expression of Interest or Request for Information followed by a Request for Tender and tenderer assessment at each stage)

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- Scores for each tenderer against pre-determined criteria and weightings
- Key procurement and contract risks and their mitigation as well as residual risks to be managed by the Contract Management
- Key assumptions leading to decisions and recommendations.
- Any significant probity concerns and the manner in which they were resolved.

Precedent papers have been made available to procurement team on which to base submissions and guidelines have been published to assist the team in drafting submissions.

Approvals to Award presented to Tender Board are reviewed and approved by business owners and the procurement team, including the Chief Procurement Officer. In the case of submissions to the Finance and Audit Committee, there is a comprehensive review of papers prior to presentation. These reviews are conducted by the Associate Director – Strategic and Tactical Sourcing, the Associate Director – Quality, Governance and Performance and the Chief Procurement Officer. Submissions to the Finance and Audit Committee are also reviewed by the Chief Financial Officer.

Ultimate responsibility: Chief Procurement Officer
Effective date: Tenders commencing end August 2020

Recommendation 11:

That the University should ensure all future contracts for the provision of security services include adequate provisions covering:

- **subcontracting terms**
- **contractor assurance frameworks**
- **right-to-audit clauses**
- **timesheet access**
- **technology requirements.**

Action to be taken describing activities, allocating responsibility, measures to be used

Background

Since the ICAC investigation and public hearing, the University's Campus Infrastructure Services (CIS) portfolio has been split into two professional service units:

- University Infrastructure (UI), responsible for planning and design, property development, infrastructure delivery, space and sustainability
- Central Operations Services (COS), responsible for managing building/facilities and ground services and maintenance, repairs, cleaning, internal mail, waste collection and recycling, protective services, building access, venue bookings and client-service teams.

Recommendation 11 response

In 2019, the University executed a new contract for the provision of security services. The contract included adequate provisions covering:

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- Subcontracting terms – the contractor must not subcontract any part of the services without first obtaining the University’s prior written approval of the services to be subcontracted and of the proposed subcontractor
- Contractor assurance frameworks – the contractor must maintain an administration manual covering aspects such as quality assurance, work health and safety policy, risk management and risk register, requirements of the modern Award, and an audit and inspection plan developed in accordance with the contractor’s quality assurance framework.
- Right-to-audit clauses – the University has rights to audit the contractor’s records to verify compliance with the contract
- Timesheet access – the daily physical timesheets of contractor staff are held by the University’s Operations Manager and verified against biometric data confirming the identity of the individuals and the duration of their shift, with appropriate follow-up of any variances.
- Technology requirements – the contractor must use the University’s Archibus work management system to manage all requirements of the services performed under the contract. Contractor staff must provide biometric data when they commence and scan in and out for individual shifts, to allow verification of timesheet data. Compliance is formally monitored on a monthly basis as part of the contractor’s key performance indicators.

The University will ensure that future contracts for the provision of security services include similar provisions.

Ultimate responsibility: Director Asset Management & Operations

Effective date: Security Services Contract commencing 16 September 2019

Recommendation 12:

That security contractors should be required to provide evidence that they have properly implemented internal controls to ensure that security staff (including subcontractors) have completed their duties in accordance with the contract and work orders.

Action to be taken describing activities, allocating responsibility, measures to be used

Recommendation 12 response

The University’s new contract for the provision of security services ensures that the security contractor is required to provide evidence that they have properly implemented internal controls to ensure that security staff (including subcontractors) have completed their duties in accordance with the contract and work orders.

At a framework level

Under the new contract, the contractor is required to maintain a performance management framework and quality assurance framework. This is supported by detailed reporting requirements around work management and compliance and key performance indicators. The University also has right-to-audit access to the contractor’s records.

At a granular level

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Under the new contract, contractor staff must provide biometric data when they commence and scan in and out for individual shifts, to allow verification of timesheet data. Compliance is formally monitored on a monthly basis as part of the contractor's key performance indicators.

The daily physical timesheets of contractor staff are held by the University's Operations Manager and verified against the biometric data confirming the identity of the individuals and the duration of their shift, with appropriate follow-up of any variances.

At month end, the University reviews the contractor invoices submitted against the contract and any work orders, and reconciles the verified timesheet data against the contractor invoices, to evidence that the security staff (including subcontractors) have completed their duties in accordance with the contract and work orders.

Ultimate responsibility: Director Asset Management & Operations

Effective date: Security Services Contract commencing 16 September 2019

Recommendation 13:

That the University should document its internal contractor controls. A report of the conduct of the controls, exceptions to the controls and the resolution of those exceptions should be given to relevant managers in CIS.

Action to be taken describing activities, allocating responsibility, measures to be used

Background

As outlined in the Background to Recommendation 11, CIS has now been split into two professional service units, University Infrastructure (UI) and Central Operations Services (COS). Reading Recommendation 13 in the context of the ICAC report, the response refers to contracts under the control of COS, which is now responsible for a wide range of activities formerly overseen by CIS, including the provision of security services.

Recommendation 13 response

Informed by the findings of the ICAC public hearing, the University undertook a careful review of the security services internal contractor controls, the conduct of the controls and exceptions to the controls. The tender specifications for the new contract for the provision of security services was developed to ensure that it resolved any exceptions and implemented a robust framework for implementing and monitoring key internal contractor controls, including:

- Contract Management Plan – Outlines the requirements and governance to manage the contract (s) requirements.
- Contract Guide – Provides the key drivers and obligations to meet minimum deliverables and maximise opportunity.
- Contract Deliverables – Provides a listing with key accountability of each of the deliverables for both parties.
- Contractor Administration Manual – Provides full transparency of what, when and how the contractor is required to meet the contractual requirements, set within the Agreement.
- Key performance indicators and reporting. - Outlines the performance expectations to regulate and effectively manage performance obligations.

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The new contract for the provision of security services executed by the University in 2019 embodies this framework.

Ultimate responsibility: Director Asset Management & Operations
Effective date: Security Services Contract commencing 16 September 2019

Recommendation 14:

That the University should perform random checks that security guards are on duty. These could include GPS monitoring, reviewing CCTV and access records, and surprise visits to certain locations.

Action to be taken describing activities, allocating responsibility, measures to be used

Recommendation 14 response

Subject to compliance with privacy requirements, the University undertakes random checks to ensure that security guards are on duty on a 24 hour a day, 7 days a week basis. Checks are undertaken by the University's Operations Controllers using a variety of methods:

- Review of rosters and biometric scan in and scan off data
- Review of CCTV footage
- Surprise visits to certain locations to verify presence.

A record of these checks is maintained as part of "end of shift" reporting requirements and is submitted on a daily basis to the Head of Security and Emergency Management and the Director Asset Management and Operations for independent review. The information is also available for cross-checking purposes when the month-end invoice checks are undertaken. Compliance is tracked and formally reported through the monthly contractor key performance indicators process.

Ultimate responsibility: Director Asset Management & Operations
Effective date: Security Services Contract commencing 16 September 2019

Recommendation 15:

That there should be a regular rotation between at least two University employees who undertake contractor checks to ensure that security services are provided.

Action to be taken describing activities, allocating responsibility, measures to be used

Recommendation 15 response

As outlined in the response to Recommendation 14, random checks on security guards are undertaken by the University's Operations Controllers. The Operations Controller position is covered by two people on a 24-hour a day, 7 days a week basis, overseeing all contracted labour and providing verification that security services were provided. A record of these checks is maintained as part of "end of shift" reporting requirements and is submitted on a daily basis to the Head of Security and Emergency Management and the Director Asset Management and Operations for independent review.

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Ultimate responsibility: Director Asset Management & Operations
Effective date: Security Services Contract commencing 16 September 2019

Recommendation 16:

That the University should have access to guard timesheets. The University should also inspect the timesheets to ensure compliance with legislative requirements and the contract, and to help confirm charges on invoices.

Action to be taken describing activities, allocating responsibility, measures to be used

Recommendation 16 response

Under the University's new contract for the provision of security services, the daily physical timesheets of contractor staff are held by the University's Operations Manager and verified against biometric data confirming the identity of the individuals and the duration of their shift, with appropriate follow-up of any variances.

The University inspects the timesheets to ensure compliance with legislative requirements and the contract.

At month end, the University reviews the contractor invoices submitted against the contract and any work orders, and reconciles the verified timesheet data against the contractor invoices, to evidence that the security staff (including subcontractors) have completed their duties in accordance with the contract and work orders and to confirm the charges on the invoices.

Ultimate responsibility: Director Asset Management & Operations
Effective date: Security Services Contract commencing 16 September 2019

Recommendation 17:

That security contractors should be required to provide specimen signatures against which the signatures of guards should be checked.

Action to be taken describing activities, allocating responsibility, measures to be used

Recommendation 17 response

Under the University's new contract for the provision of security services, when contractor staff commence, they must attend a University induction and show their Driver's Licence, which includes a specimen signature contained within their valid drivers' licence. The University retains a copy of the signature on a secure electronic portal as a reference. At the same induction, the contractor staff provide biometric data which defines the security staff identification profile, which provides identify verification when they scan in and scan off at the start and end of shifts. The biometric compliance is measured daily and measurable under the KRA / KPI monthly contractual obligation. The Biometric is one of the verifications used by the university for payment, of the invoiced monthly amount.

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The total identity requirements (i.e. signature, Biometric, training etc) must be valid, for any security staff to undertake any shift of duties.

Ultimate responsibility: Director Asset Management & Operations
Effective date: Security Services Contract commencing 18 April 2019

Recommendation 18:

That the University should have key performance indicators (KPIs) in place that cover the essential requirements for the provision of security services. It should also ensure KPI monitoring for security contracts is based on data that is trustworthy, measurable and relevant, and that reliance on contractor self-reporting is minimalised.

Action to be taken describing activities, allocating responsibility, measures to be used

Recommendation 18 response

Under the University's new contract for the provision of security services, the University has established key performance indicators (KPIs) that cover the essential requirements for the provision of security services. Key clauses and schedules within the contract that outline the KPI requirements include:

- Performance management framework (clause 12 and Schedule 5)
- Reporting requirements (Schedule 4)
- Security Services key performance indicators (Schedule 7).

The contractor's KPI performance is reviewed and monitored by the University:

- On a monthly basis via formal contract performance reporting and engagement
- On a quarterly basis via discussion in a steering committee with Contract Snr Mgmt
- On an annual basis via a formal contract review.

To ensure that the KPI monitoring for security contracts is based on data that is trustworthy, measurable and relevant, and that reliance on contractor self-reporting is minimalised, the University sources or independently logic-checks as much of the KPI data as possible via the University's Central Operations Services Service Excellence and Innovation team.

Ultimate responsibility: Director Asset Management & Operations
Effective date: Security Services Contract KPI monitoring commencing 1 November 2019

Recommendation 19:

That the University should develop controls to identify when contract variations exceed 10% of the original contract amount. It should also clarify that a sufficiently senior delegate is required to scrutinise and approve cumulative ad hoc contract payments that exceed 10% of the contract value.

Action to be taken describing activities, allocating responsibility, measures to be used

Recommendation 19 response

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The established Operations Services Agreement total contract value is endorsed by Financial Advisory Committee (FAC). Any variation regardless of the value are quantified and verified by the principal's representative. The FAC approved contract value can't be exceeded unless FAC and Vice Chancellor endorse aligned to University Delegations of Authority.

All ad-hoc requests engaged regardless of value, have an individual service request by the university, before requested and issued to the Security contractor to perform the works. Multi-level verification is undertaken for all ad-hoc payments against the claimed amount, which is verified and checked by senior management at each billing period.

All contracts sourced by Strategic Procurement and loaded into the UniBuy system have control mechanisms that do not allow for overspend without appropriate approval through by staff with appropriate delegations of authority. Once a contract with a value over \$250,000 excluding GST is executed the approved estimated or fixed value is entered into the system. When purchase orders are raised against the contract they are accumulated and deducted from the approved value. Once the funds have been expended the contract is automatically closed and no further spend is permitted. To re-open the contract a variation must be approved by the appropriate financial delegate for the total accumulated value of the contract. No tolerances are permitted under the delegations of authority.

Ultimate responsibility: Chief Procurement Officer
Effective date: 1 June 2020.

Recommendation 20:

That the University considers sharing some contract management duties between internal staff, who are co-located with security contractors, and staff, who do not have day-to-day contact with security contractors.

Action to be taken describing activities, allocating responsibility, measures to be used

Recommendation 20 response

Under the University's new contract for the provision of security services, the University has introduced appropriate separation and segregation of duties between University and contractor staff.

The security contractor has been provided with an office location in a separate building from the University's security staff and the University's contract management staff, so that there is no co-location.

The work of the security contractor staff is supervised by University Operations Controllers. The Operations Controller position is covered by two University staff on a 24-hour a day, 7 days a week basis, overseeing all contracted labour and providing verification that security services were provided.

The Operations Controllers are supervised by the University's Security Operations Manager and the Head of Security and Emergency Management, who reports to the Director Asset Management and Operations.

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Contract management data verified and provided by the Operations Controllers, the Security Operations Manager and the Head of Security and Emergency Management is submitted to the Central Operations Services Service Excellence and Innovation team for review and matching to information submitted by the contractor. The head of the Service Excellence and Innovation team has a direct reporting line to the Executive Director Central Operations Services, independent from the Director Asset Management and Operations who is responsible for the security services team.

Ultimate responsibility: Director Asset Management & Operations

Effective date: Security Services Contract commencing 16 September 2019

Recommendation 21:

That the University should develop a code of business practice or similar document and contractually bind major suppliers to comply with it. The document should include:

- **a prohibition on suppliers or potential suppliers offering gifts and benefits**
- **a prohibition on actions that place University staff or other individuals in the supply chain in conflict of interest situations**
- **a requirement for suppliers to have comparable provisions in contracts with subcontractors or other companies in the supply chain**
- **details of where people can make reports (including anonymous reports) of breaches of the code of business practice.**

Action to be taken describing activities, allocating responsibility, measures to be used

Response to Recommendation 21

The University has developed a Statement of Business Ethics which indicates that the University expects that where organisations and business operators carry out work on behalf of the University they will:

- Not offer financial inducements, gifts or benefits to University employees, contractors and consultants which might directly or indirectly compromise, influence or appear to influence them in their official University capacity
- Disclose any actual or perceived conflicts of interest and report any unethical behaviour immediately
- Act ethically at all times and conduct themselves in a professional, fair and constructive manner in all their dealings with the University
- Report unethical practice, misconduct, fraud or corruption as soon as they become aware of it.

The Statement of Business Ethics includes a link to the University's Reporting Wrongdoing Policy which details how people can make reports (including anonymous reports) of breaches. Entering in the word "wrongdoing" on the University's home webpage search tool returns the Report wrongdoing webpage, which provides information on wrongdoing including a link to the University's anonymous online reporting facility.

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The University's Request for Tender template document has been updated to include a link to the Statement of Business Ethics and to require tenderers to confirm that they will comply with its requirements. This is mirrored in the University's standard contract templates, which have been updated to require suppliers to comply with the Statement of Business Ethics and, in addition, to require that the supplier ensures that any subcontractors comply with the terms of the contract.

Ultimate responsibility: Chief Procurement Officer
Effective date: Procurement contracts end December 2020

Recommendation 22:

That the University should establish a clear mechanism, and one that is clearly communicated, for the staff of suppliers and subcontractors to report corrupt conduct.

Action to be taken describing activities, allocating responsibility, measures to be used

Recommendation 22 response

The University will establish a clear mechanism, and one that is clearly communicated, for the staff of suppliers and subcontractors to report corrupt conduct.

Steps to achieve this will include updating the:

- Statement of Business Ethics to include a direct reference to the University's Report wrongdoing webpage, and to require suppliers to notify their representatives of the webpage
- Standard procurement contract templates to require suppliers to notify their representatives of the Statement of Business Ethics and the Report wrongdoing webpage.

Ultimate responsibility: Senior Deputy Vice-Chancellor
Effective date: 1 January 2021

Recommendation 23:

That the University adopts a fraud and corruption control plan that appropriately addresses the risks of fraud and corruption. Among other things, the plan should reflect the findings made in previous Commission investigation reports concerning universities and ensure that the corruption prevention issues are not dealt with in isolation, but that the cumulative implications are properly considered.

Action to be taken describing activities, allocating responsibility, measures to be used

Recommendation 23 response

The University will research and develop a fraud and corruption control plan that appropriately addresses the risks of fraud and corruption at the University. Among other things, the plan will reflect the findings made in previous ICAC investigation reports

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concerning universities and ensure that the corruption prevention issues are not dealt with in isolation, but that the cumulative implications are properly considered.

Once developed, the fraud and corruption control plan will be submitted to senior University management and the Finance and Audit Committee for adoption.

Ultimate responsibility: Senior Deputy Vice-Chancellor

Effective date: 1 January 2021

Recommendation 24:

That all internal audit reports should be given to the director of internal audit and reported to the FAC. The internal audits should be reviewed by an internal audit manager to assess the implications of the report and whether there are red flags of possible fraud and corruption. If necessary, internal auditors' working papers should also be obtained.

Action to be taken describing activities, allocating responsibility, measures to be used

Recommendation 24 response

Internal Audit has developed a Paper defining what is meant by internal audit reports and outlining the process for advising Internal Audit of locally commissioned internal audit reports. Once approved by the Finance and Audit Committee, the Paper will be socialised with the University's Senior Executive Team and University Executive, as well as senior managers, to ensure that local areas are aware of the reporting requirement.

When received by Internal Audit, the locally commissioned internal audit reports will be reviewed by a Senior Principal Auditor to assess the implications of the report and whether there are red flags of possible fraud and corruption. If necessary, Internal Audit will obtain the working papers supporting the locally commissioned internal audit report.

Internal Audit will submit a Paper to each Finance and Audit Committee meeting:

- Listing the locally commissioned internal audit reports received and triaged in the period
- Noting which local areas commissioned them
- Summarising Internal Audit's assessment of each report for its implications and any red flags of possible fraud or corruption
- Indicating that the individual reports will be made available to the Committee on request.

Ultimate responsibility: Senior Deputy Vice-Chancellor

Effective date: 1 January 2021

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