

<b>POLICY:-</b>	
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<b>PROCEDURES/GUIDELINES:-</b>	
Date procedure/guideline was developed:	
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<b>RESPONSIBILITY:-</b>	
Draft Policy developed by:	Director of Finance and Administration
Committee/s (if any) consulted in the development of this Policy:	Audit, Risk and Improvement Committee
Responsibility for implementation:	Director of Finance and Administration
Responsibility for review of Policy:	Director of Finance and Administration

## Policy Statement

The Fraud and Corruption Prevention Policy is designed to protect public funds, assets, and to ensure the integrity, security and reputation of the Council and its staff whilst maintaining a high level of services to the community.

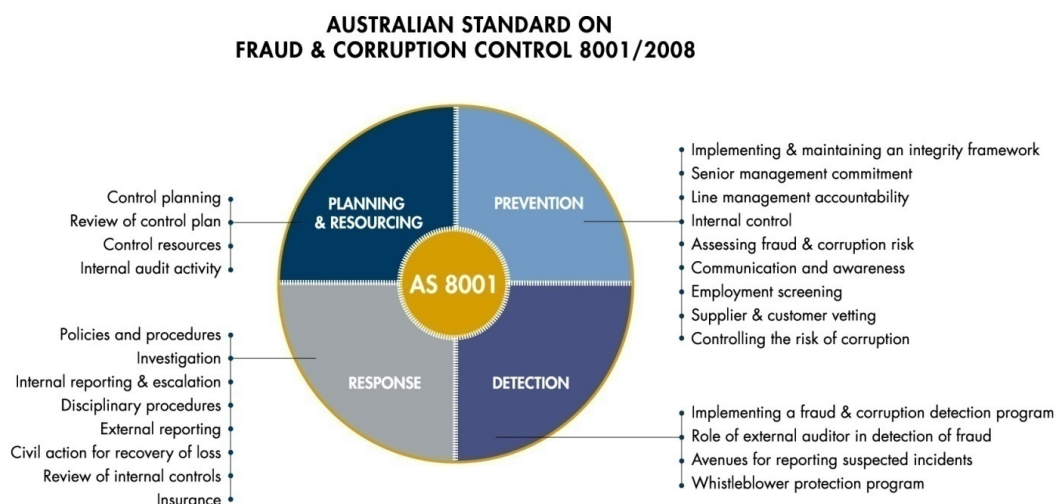
The elements of Council's policy include:-

1. Prevention of losses through fraud by the implementation of fraud prevention procedures;
2. A commitment to a policy of detection, investigation and prosecution of individual cases of fraud; and
3. Fraud control and prevention is the responsibility of all Council officials.

Council is committed to preventing fraud at its origin. Council believes that an emphasis on prevention and detection is the best way to deal with fraud. The underlying thrust of Council's policy on fraud prevention is to encourage the public and staff to understand that fraudulent acts against Council are unacceptable, may constitute a criminal offence and will be prosecuted.

Any effective fraud prevention strategy ensures that prompt action will be taken when fraud is detected, both to bring the fraud to an end and to discourage others who may be inclined to commit similar conduct.

Key components of successful fraud and corruption prevention include: *Planning and Resourcing, Prevention, Detection and Response*. A Fraud and Corruption Risk Assessment is an essential component of fraud prevention, however it is just one element of a holistic approach to fraud risk management as depicted in the diagram below:-



The fraud and corruption risk assessment should be conducted on a regular basis to ensure it remains accurate and up to date. If there are significant changes to Council's business operations such as opening new operations then a separate fraud risk assessment shall be conducted.

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## **1. Purpose**

### **1.1 Introduction**

Council is committed to educating staff and Councillors in relation to fraud indicators and corruption prevention activities Council will endeavour to meet the legislative obligations under the *Local Government Act 1993*,

Risk exposure from fraud and corruption related activities can be significant and the effective management and monitoring of this type of risk is vital. Council needs to be assured that appropriate and transparent management strategies, including the implementation of relevant policies, are subjected to monitoring and regular review.

This Fraud and Corruption Prevention Policy provides an outline for the management of fraud and corruption related activities. It is consistent with and supported by Upper Lachlan Shire Council's Code of Conduct.

### **1.2 Corporate Vision and Values**

The Tablelands Regional Councils "Vision Statement" is:-

*"To build and maintain sustainable communities while retaining the regions natural beauty."*

Upper Lachlan Shire Council will conduct its activities in accordance with the values of Sustainability, Integrity, Respect and Professionalism.

Councillors and staff are to act in accordance with Council's vision and values whilst undertaking Council related business. Upper Lachlan Shire Council's Code of Conduct for Councillors, Staff and Delegates further articulates its values as:-

*"The values which underpin this Code of Conduct and which must be abided by are:-*

- *Responsibility to the Council, its policies and decisions;*
- *Respect for members of the community and colleagues;*
- *Integrity of purpose and acting in the public interest;*
- *Open and transparent decision-making; and*
- *Responsive and efficient service."*

Council's vision and values set the framework for this Fraud and Corruption Prevention Policy.



## **2. Application**

This Policy applies to all Council Officials. Council Officials are defined to include Councillors, members of Council staff and delegates of Council. A delegate of Council is a person or body to whom a function of Council is delegated, such as staff, Councillors, community representatives, volunteers, consultants and contractors.

## **3. Definitions**

### **3.1 What is fraud?**

Fraud is defined in Australian Standard on Fraud and Corruption Control (AS 8001) as:-

*“Dishonest activity causing actual or potential financial loss to any person or entity including theft of moneys or other property by employees or persons external to the entity and whether or not deception is used at the time, immediately before or immediately following the activity. This also includes the deliberate falsification, concealment, destruction or use of falsified documentation used or intended for use for a normal business purpose or the improper use of information or position.”*

For the purpose of this Policy, fraud is not restricted to tangible benefits only and includes intangibles such as information which may not be in documentary form.

### **3.2 What is corruption?**

For the purpose of this Policy, corruption and corrupt conduct will have the same meanings as defined in the *ICAC Act 1988*.

Also, Corruption is defined in Australian Standard on Fraud and Corruption Control (AS 8001) as:-

*“Dishonest activity in which a director, executive, manager, employee or contractor of an entity acts contrary to the interests of the entity and abuses the position of trust in order to achieve personal gain or advantage for him or herself or for another person or entity.”*

In summary, corrupt conduct means any dishonest activity which could affect the honest or impartial exercise of official functions, or may be a breach of trust, or may involve the misuse of any Council information by any Council Official.

### **3.3 What are the Elements of controlling Fraud and Corruption Risks?**

The Australian Standard AS8001 classifies the elements of controlling fraud and corruption risks into three categories:-

**Structural Elements:** sound ethical culture, senior management commitment, periodic assessments of fraud and corruption risks, staff awareness, and fraud and corruption control planning.

**Operational Elements:** internal controls, fraud detection programs, mechanisms for reporting suspicions of fraud and corruption, dealing with detected or suspected fraud or corruption, management accountability for the control of fraud and corruption risk, internal audit controls, protection of whistleblowers, allocation of resources to control fraud and corruption risks, insurance and pre-employment screening.

**Maintenance Elements:** review of the effectiveness of the fraud and corruption control strategies, ongoing monitoring of the ethical culture and review and adjustment of the Fraud and Corruption Prevention Policy. These elements are considered throughout this Policy.

## **4. Key Signals and Risks**

### **4.1 Fraud and Corruption Signals**

There are a number of potential fraud and corruption signals which Councillors, staff and delegates of Council should be alert to, in identifying fraud and corrupt activities. These signals include:-

- Council Officials who use illogical excuses and reasons for unusual events or actions;
- Senior staff involved in routine processing work such as opening incoming mail correspondence, purchasing, ordering and receiving of goods, and who assume subordinates duties;
- Staff evidently living beyond their means, who have access to funds or control or influence over service providers;
- Excessive staff turnover;
- Staff who do not, or will not, take holidays for extended periods;
- Council Officials who get easily annoyed or defensive at reasonable questioning;
- Potential conflicts of interest not declared;
- Excessive number of duties or lack of independence in processing duties (e.g.; both processing and approving the same transaction);
- Lack of separation in decision-making and performance of duties;
- Undue secrecy, or excluding people from accessing available information;
- Council Officials who treat controls, policies and procedures as challenges to overcome or be defied and consistent non compliance with directives, policy, and procedures;

- Failure to conduct adequate reference checks on staff prior to employment;
- Unauthorised changes to systems or work practices;
- Missing documentation or a lack of record keeping;
- 'Blind approval' where the person signing does not sight supporting documentation;
- Duplicates only of tax invoices;
- Signing and approving expenditure beyond their delegation of authority limitation;
- Alteration of documents such as file notes, manual or computerized records, vehicle and equipment log books and timesheets, without reasonable evidence or grounds for alteration;
- Council Officials who exhibit an inclination to cover up inefficiencies or errors;
- Frequent association with, and entertainment by, a member of a supplier's staff;
- Councillors directing or influencing, or attempting to direct or influence any member of staff or other Council Official in the exercise of their official functions; and
- Council Officials attempting to influence other Council Officials to approve Development Applications which do not meet Council codes or policy or refuse Development Applications which do meet Council codes or policies.

#### **4.2 Fraud and Corruption Risks**

Council has a number of fraud and corruption risks. Ongoing responsibility for these is with Senior Managers.

Identified fraud and corruption risks are to be considered when Council reviews risks to the organisation as a whole. Fraud and corruption risk areas for Council which require specific attention include the following:-

- Conflicts of Interest:** Conflicts of Interest exist when Council Officials could be influenced, or a reasonable person would perceive that they could be influenced, by a personal interest when carrying out their public duty. Councillors, senior management and Committee members are provided, on a monthly and/or quarterly basis, with a pecuniary and non-pecuniary interest disclosure form with the Council and/or Committee meeting business papers.
- Bribes, including Gifts or Benefits:** Council Officials must never demand or request any gift, benefit or bribe in connection with their Council work or duties or status with Council. Council has a Bribes, Gifts and Benefits Policy and this should be referred to for guidance.
- Information Technology:** Council Officials are required to adhere to Council's information security requirements which protect the integrity of Council's information systems. The protection of confidential information is vital. Inappropriate use of Council's computer systems is not tolerated. Council has an Internet and Email Policy, iPad Policy, Digital Information



Security Policy, Social Media Policy, and Records Management Policy and these policies should be referred to for guidance.

- (d) **Recruitment and Selection:** Independence, accountability and transparency in recruitment and selection processes is vital. By adhering to these principles, Council has the ability to attract and retain the right personnel to enhance its performance. Council has a Recruitment and Selection Policy and this should be referred to for guidance.
- (e) **Purchasing and Tendering:** Council regularly contracts for the purchase and supply of a wide range of goods and services. Objectivity and impartiality in the assessment of goods and services to be purchased is vital. Council has a responsibility to ensure that physical security of the goods is maintained. Council also has a Statement of Ethical Principles and a Purchasing and Acquisition of Goods and Services Policy. These should be referred to for guidance.
- (f) **Development Applications:** The Development Application and assessment process can be contentious and high risk in terms of corrupt activity, whereby potential applicants or objectors may want to unduly influence Council Officials in the course of their duties. Council has a DA (Development Application) Guide which documents the process for the assessment of development applications and this should be referred to for guidance.
- (g) **Cash Handling:** Theft of cash is one of the most basic frauds. Many areas of Council are involved in the handling of cash on a daily basis. All income is to be promptly entered into accounting records and immediately secured and all cheques immediately endorsed. Procedures for cash handling are to be strictly adhered to across Council and should be referred to for guidance. Council has a Cash Handling Policy and Internal Control Procedures Manual which should be referred to for the correct procedure.
- (h) **Delegations:** There are a number of provisions relating to delegations in the *Local Government Act 1993* and these must be followed. Delegations give staff the authority to make certain decisions, perform certain functions or undertake certain activities. Delegations must be formally documented, granted and retained on file. Delegated authority should not be exceeded by any person and each staff member is responsible for ensuring they are aware of the level of their delegated authority. Delegated authority should only be used in the course of undertaking Council business. You should refer to Council's Delegation of Authority Policy and register.
- (i) **Time Recording:** Staff time is a valuable resource. All significant staff time is to be accounted for in the course of work. Council staff members are required to be accountable for, and accurately record their time whilst undertaking Council duties.



- (j) **Use of Council Resources:** Council resources are anything which is paid for, owned or controlled by the Council. It includes financial, material and human resources. Councillors and staff are expected to be efficient, economical and ethical in their use and management of Council resources. Council resources should only be used for Council purposes and in the public interest. Council's Code of Conduct should be referred to for guidance.
- (k) **Stock Control:** Council has a significant quantity of stock of both low and high value in dollar terms. Council management and staff should ensure adequate internal controls are enacted to reduce the potential for fraudulent activity associated with stock control. Purchasing and Acquisition of Goods and Services Policy and the Internal Control Procedures Manual should be referred to for guidance.
- (l) **Obtaining Personal Benefit by Provision of Additional Service:** Council provides a wide range of services to our community. In the provision of a service the situation may arise where a Council staff member is requested to provide additional services or carry out work further that is not programmed or authorised by Council. This can provide opportunity for a staff member to seek or receive a personal benefit or payment for the provision of the additional service.

Using Council staff time and Council resources to provide a staff member with a personal benefit deprives Council of that benefit or income. Council's Secondary Employment Policy requires that all Council staff declare any work or employment additional to the duties required by Council.

## **5. Reporting**

Under the Code of Conduct there is an obligation for each council official to report any improper conduct, which includes suspected fraudulent or corrupt behavior or breaches of this Policy. An individual may report the matter either internally or externally as outlined below.

You should report your suspicions to only those people who absolutely need to know. This protects an individual from allegations that may not be proven and prevents the possible destruction of evidence.

### **5.1 Internal Reporting**

Councillors, staff and delegates of Council must report, as soon as possible, any suspected fraudulent or corrupt behavior, to:-

- Their Supervisor, Manager and/or Departmental Director; or
- Council's designated Complaints Coordinator; or
- General Manager; or
- Mayor.

Supervisors, Managers, and Departmental Directors have an obligation to immediately pass on the reports of suspected fraudulent or corrupt behavior or breaches of this Policy to the Complaints Coordinator or General Manager.

The only exception to this is where the General Manager is suspected of conduct relating to fraud and corruption, in which case the matter should be reported to the:-

- Mayor;
- Council's designated Complaints Coordinator;
- Independent Commission against Corruption (ICAC);
- Other relevant external agency.

## **5.2 External Agencies**

Alternatively, matters relating to suspected fraudulent or corrupt activities can also be reported to the following external agencies:-

- The Independent Commission Against Corruption (ICAC) – Telephone 8281 5999 (*in the case of allegations of fraud or corruption*).
- The Office of Local Government – Telephone 4428 4100 (*in the case of allegations relating to pecuniary interests*).
- NSW Ombudsman – Telephone 9286 1000 (*conduct of Councillors, Council employees and conduct of the Council itself, specifically public interest disclosures*).
- NSW Police – Telephone 9281 0000 (*in the case of allegations relating to fraud or criminal behaviour*).
- NSW Electoral Commission – Telephone 9290 5999 (*in the case of allegations relating to election fraud*).

## **6. Responsibilities**

### **6.1 Responsibilities as an Organisation**

As an organisation, Council will ensure that:-

- Relevant risk exposures of significance to the Council are identified. The evaluation of risk and assessment of risk is a critical determinant in Council's approach to fraud prevention and detection;
- Relevant legal obligations are monitored to ensure that operating procedures and conditions meet these obligations;
- The Code of Conduct and associated policies are developed and publicised within the organisation;
- Appropriate fraud prevention and detection controls are incorporated when developing and maintaining computer and/or other systems;
- Employees are trained and understand relevant Council policies and the legislative requirements of protection for informants who make protected disclosures under the *Public Interest Disclosures Act 1994*;
- An environment exists in which fraud and corruption related activity is discouraged; and

- Investigation of allegations is to be undertaken, in the event of a report of fraud or corruption related activity, that they are notified to the NSW Police, the ICAC, the NSW Electoral Commission and/or the Office of Local Government for investigation and/or prosecution.

There are a number of specific responsibilities associated with the prevention of fraud and corruption related activity. These are set out below.

## **6.2 Councillors**

Councillors have responsibility for directing and controlling the affairs of Council in accordance with the requirements of the *Local Government Act 1993*. Councillors have an obligation to report possible fraud and corruption related activities to the Mayor or General Manager. Councillors should also provide support to other Councillors, the General Manager and/or staff who may make such disclosures or manage such disclosures in the course of their duties.

Councillors must:-

- Be aware of and comply with the requirements of this Policy, Council's Code of Conduct, and all supporting procedures; and
- Report suspected fraudulent or corrupt behavior or breaches of this Policy to the Mayor, or General Manager or external agencies.

## **6.3 General Manager**

The General Manager has the primary responsibilities for overseeing the day-to-day operations of Council, the proper management of Council resources, and the development and implementation of systems and practices to minimise the risk of fraud and corruption.

In addition to the responsibilities of staff, Managers and Directors, the General Manager is responsible for:-

- Implementing fraud control throughout the organisation;
- Ensuring that, where required, matters reported under this Policy or breaches of Council's Code of Conduct, are properly investigated and outcomes of an investigation are reported to Council; and
- Reporting criminal offences to the NSW Police and actual or suspected corrupt conduct to the Independent Commission against Corruption (ICAC) under *Section 11, of the ICAC Act 1988*.

## **6.4 Directors and Managers**

Departmental Directors and other senior management staff are required to carry out the duties and functions set out in the policies of Council as adopted by Council from time to time. Further, they support the General Manager by ensuring that the corporate systems, policies and procedures are accountable and implemented, managed, reviewed and reported on a regular basis.



In addition to the responsibilities of all staff, Managers, Directors and other senior management staff have an obligation to:-

- Ensure any matters of irregularity or suspected fraud or corruption reported to them are promptly forwarded to the General Manager or Complaints Coordinator and dealt with in accordance with this Policy;
- Ensure that there are adequate measures in place to prevent and detect fraud and corruption within their area of responsibility;
- Make staff aware of this Policy and the procedures required, including making them available for training sessions;
- Ensure staff understand their responsibilities through adequate supervision, position descriptions; written procedures and the like;
- Comply with legislative requirements and Council policies and procedures;
- Respond positively to matters raised and advice provided by the internal auditor; NSW Audit Office as external auditor; the Council Audit, Risk and Improvement Committee; and other external agencies;
- Proactively encourage staff to raise suspected fraudulent or corrupt behavior or breaches of the Policy and to ensure staff are supported; and
- Set an example by demonstrating principles of ethics, accountability and efficiency.

### **6.5 All Staff**

Employees have a duty to ensure they adequately report any concerns they may have about the conduct of Council affairs including the use of Council assets and resources.

All staff members are responsible for:-

- Being aware of this Policy;
- Ensuring that they operate in accordance with policy and legislative requirements to not participate in fraudulent or corrupt behavior;
- Reporting in accordance with this Policy any suspicion of fraudulent or corrupt behavior to the General Manager, Complaints Coordinator, and/or Departmental Director; and
- Reporting to their Manager and/or Supervisor, any deficiencies or suspected deficiencies with this Policy or deficiencies with any internal control procedures.

### **6.6 Audit, Risk and Improvement Committee**

The Audit, Risk and Improvement Committee is an essential element of internal control within the Council. The Committee oversees the work of senior management and an internal auditor ensuring the independence of this role. The Committee has a role in identifying any areas that may be susceptible to fraud and corruption related activities for possible audit review.

The NSW Audit Office shall articulate audit requirements so that there is a reasonable expectation of detecting material misstatements in the Financial Statements resulting from fraud or corruption, or a breach of legislation.



## **6.7 Members of the Public**

In accordance with the Statement of Business Ethics, Council requires all suppliers of goods and services, applicants, consultants, contactors, owners and applicants of development applications and anyone doing business with Council, to observe the following principles:-

- Act ethically and honestly in all dealings with Council;
- Declare actual or perceived conflicts of interests as soon as the conflict becomes apparent;
- Comply with Council's procurement and purchasing policies and procedures;
- Provide accurate and reliable information when required;
- Take all reasonable measures to prevent disclosure of confidential Council information;
- Refrain from engaging in any form of collusive practice including offering Councillors, staff and delegates' inducements or incentives designed to improperly influence the conduct of their duties; and
- Assist Council to prevent unethical practices in business relationships.

By making this document available publicly Council aims to demonstrate to the general community our commitment to addressing fraud. Further, there are some aspects of Council's Policy that do seek the involvement of people other than Councillors, staff and management. Council also invites members of the public, including our customers and service providers, to do the same. If you are not employed by Council, but you suspect fraud or corruption that involves Council in some way, please **report your suspicions** to any of the following:-

- The General Manager;
- The Office of the NSW Ombudsman – Telephone 9286 1000;
- The Independent Commission Against Corruption (ICAC) – Telephone 8281 5999 (in the case of allegations of fraud or corruption);
- The Office of Local Government – Telephone 4428 4100 (in the case of allegations relating to pecuniary interests);
- NSW Police – Telephone 9281 0000 (in the case of allegations relating to criminal activity);
- NSW Electoral Commission – Telephone 9290 5999 (in the case of allegations relating to election fraud).

## **7. Monitoring**

Council's commitment to fraud and corruption control will be met by actively investigating allegations of fraud or corrupt activity in a timely manner. As appropriate Council will report fraudulent or corrupt activity to relevant authorities and/or initiate disciplinary action under the Code of Conduct.

The General Manager, assisted by Complaints Coordinator, Departmental Directors, Managers, and the Audit, Risk and Improvement Committee, will monitor fraud and corruption activities and identify and act on any trends that arise.

## **8. Protected Disclosures/Whistleblowers**

Council is committed to supporting persons who report wrongdoing and who have done so voluntarily and in good faith through a protective disclosure. Council is committed to the aims and objectives of the *Public Interest Disclosures Act 1994*.

If any person reports suspected fraud or corrupt conduct through the appropriate channels, as set out above, they may seek protection from detrimental action under the *Public Interest Disclosures Act 1994*. This protection may apply whether the matter is reported internally or externally.

## **9. Conducting Investigations**

### **9.1 Investigations**

On receipt of an allegation of suspected fraudulent or corrupt behavior, the General Manager will determine if an investigation should be undertaken as well as its nature and scope.

The General Manager shall delegate to the Council Complaints Coordinator responsibility to instigate an investigation or engage an, adequately qualified, independent person as the conduct reviewer. The investigation must be impartial, sensitive to the rights of individuals and ensure that the purpose of any investigation is to discover all relevant facts.

The investigation must follow procedures outlined in the Code of Conduct for local councils and associated procedures.

The Council Complaints Coordinator shall refer any code of conduct complaints to a conduct reviewer to conduct a preliminary assessment of the complaint prior to commencing an investigation except where the General Manager and Council Complaints Coordinator reasonably believe that a criminal offence has been committed. In this instance ICAC will be notified and the matter reported to the NSW Police. In such a case Council will only investigate sufficiently to form this view leaving further investigation to the Police.

### **9.2 Conduct Review Investigations**

An allegation made against the General Manager of fraud is the responsibility of the Council's Mayor and Complaints Coordinator to undertake a preliminary assessment of the complaint. If required an investigation will be initiated and conducted by a supplier appointed from the Council Conduct Review Panel.

The conduct reviewers must have relevant qualifications and experience as outlined by the Office of Local Government.

Where a Conduct Review finds that a Councillor has breached the Code of Conduct, in terms of fraudulent activity, Council may take actions as outlined in the Code of Conduct for local councils.

### **9.3 External Notifications**

The *Independent Commission against Corruption Act 1988* requires the General Manager to report suspected instances of corrupt conduct, including fraud, to the Independent Commission against Corruption (ICAC).

### **9.4 Advice to Supervisors or Managers**

Allegations of actual or suspected fraud or corrupt conduct can cause stress and disruption in the workplace. Information on investigations into allegations of this type should be on a strict 'need to know' basis.

Those who report suspicions should be encouraged to provide this information to only those people who absolutely need to know. This protects people from allegations that may not be proven and prevents the possible destruction of evidence.

Who needs to know will vary from case to case. People in a work area may not know an investigation is occurring. Supervisor or Managers should not promote or tolerate idle gossip. Statements based on gossip rather than fact can impede an investigation.

## **10. Responsible Officer**

The Manager Legal, Records and Governance is the officer responsible for the Fraud and Corruption Prevention Policy.

These responsibilities specifically include:-

- Ensuring Policy is current and in line with legislation and/or Council's other policies; and
- Providing a point of contact for anyone wanting information or advice about the meaning and application of this Policy.

## **11. Review Date**

This policy will be reviewed every three (3) years. If legislative requirements alter, this Policy should be reviewed to accord with these requirements.

## **12. Record Keeping, Confidentiality and Privacy**

Council will maintain effective record keeping systems to demonstrate due process has been followed for all actions and decisions arising out of the implementation of this Policy. All investigative documentation will comply with relevant legislative provisions, will remain strictly confidential and will be retained in accordance with the State Records Act 1998 in Council's electronic document management system.

### **13. Breaches and Sanctions**

A breach of the Fraud and Corruption Prevention Policy amounts to a breach of Council's Code of Conduct for Councillors, staff and delegates and therefore invokes the sanctions as outlined by that Code.

Criminal action may be taken against any person found to be in breach of any legislation.

### **14. Relevant Legislation and Council Policies**

The following legislation and Council policies that are relevant to this Policy include:-

- Local Government Act 1993;
- Local Government (General) Regulations 2005;
- Local Government Amendment (Governance and Planning) Act 2016;
- Ombudsman Act 1974;
- Environmental Planning and Assessment Act 1979;
- Roads Act 1993;
- Work Health and Safety Act 2011;
- Fair Work Act 2009;
- Independent Commission against Corruption Act (ICAC) 1988;
- Public Interest Disclosures Act 1994;
- Crimes Act 1900;
- Risk Management Standard ISO31000-2009;
- Australian Audit Standard AUS210 / ASA240;
- Australian Standard on Fraud and Corruption Control AS8001;
- Anti Discrimination Act 1977;
- Equal Employment Opportunity Act 1987;
- Industrial Relations Act 1996;
- State Records Act 1998;
- Local Government (State) Award 2020;
- Government Information (Public Access) Act 2009;
- Privacy and Personal Information Protection Act 1998;
- Code of Conduct for Councillors, staff and delegates of Council;
- Council's Code of Meeting Practice;
- Council's Code of Business Practice;
- Council's Internal Control Procedures Manual;
- Council's Integrated Plans; including Community Strategic Plan, Resourcing Strategy, Delivery Program and Operational Plan;
- Payment of Expenses and Provision of Facilities Policy;
- Interaction between Councillors and Staff Policy;
- Public Interest Disclosures - Internal Reporting Policy;
- Government Information (Public Access) Policy;
- Internet and Email Policy;
- Social Media Policy;
- iPad Policy;



- Bribes, Gifts and Benefits Policy;
- Complaints Management Policy;
- Equal Employment Opportunity (EEO) Management Plan;
- Purchasing - Acquisition of Goods and Services Policy and Procedures;
- Delegations of Authority Policy and Procedure;
- Recruitment and Selection Policy;
- Statement of Ethical Principles;
- Grievance Policy;
- Disciplinary Policy;
- Corporate Credit Card Policy;
- Secondary Employment Policy;
- Private Works (Projects and Plant Hire) Policy;
- Records Management Policy;
- Private Use of Council Motor Vehicles Policy;
- Cash Handling Policy;
- [‘Fact-Finder - A 20-step guide to conducting an inquiry in your organisation’](#) Independent Commission Against Corruption, November 2003; and
- “Managing an organisation through an ICAC Investigation: Practical advice for management’ Independent Commission against Corruption, August 2002”.

### **Variation**

Council reserves the right to vary or revoke this policy.