Council Policy NB-P-22
Fraud and Corruption Control Policy

Purpose

This policy sets standards and provides guidance on how to control fraud and corruption at Northern Beaches Council (Council) and is based on the Independent Commission Against Corruption's Sample Fraud and Corruption Control Policy.

Policy Principles

Council is committed to minimising fraud and corruption in the workplace. To achieve this, Council has adopted and resourced a fraud and corruption control framework that aligns to better practice.

The public, our staff and other people we deal with are entitled to expect each of us to act with integrity and to protect resources, information, revenues, reputation and the public interest.

Council is committed to an honest and ethical environment that minimises fraud and corruption. Fraud and corruption are incompatible with our values and present a risk to the achievement of our objectives and the provision of our services to the public.

Council has a zero-tolerance approach to fraud and corruption.

Fraud and corruption control framework

Council has an agency-wide fraud and corruption control framework that is consistent with the NSW *Fraud and Corruption Control Policy* (Treasury Circular 18-02). Council's fraud and corruption control framework includes this Policy and the documents listed below under the heading "References and Related Documents". It is the policy of Council to:

- align to better practice advice issued by organisations such as the NSW Independent Commission Against Corruption, the NSW Ombudsman and Audit Office of NSW and takes account of the Audit Office NSW Fraud Control Improvement Kit 2015 and the Australian Standard for Fraud and Corruption Control 2021 (AS8001-2021)

- as part of its framework, implement internal controls that prevent, detect and respond to fraud and corruption, as detailed in Council's Fraud and Corruption Control Plan

- assess its fraud and corruption risks every year

- ensure all staff, including contractors, are aware of relevant fraud and corruption risks and are trained to understand Council's values, codes, policies and expectations of behaviour

- report annually to the Audit, Risk and Improvement Committee on the status of the fraud and corruption control framework and risks (including compliance with this Policy)

- treat all complaints about, and instances of, fraud and corruption seriously. Council will cooperate with all relevant investigative and regulatory bodies and will take fair, proportionate disciplinary action against any employee or third party found to have engaged in fraud or corruption.

Key roles and responsibilities

In addition to the responsibilities of all staff and managers set out below, the following officers and groups have key roles in relation to controlling fraud and corruption.

- The CEO (along with the Chief Executive Team and the Executive Leadership Team) is responsible for ensuring that an agency-wide fraud and corruption control framework is in place, modelling the highest standards of ethical behaviour and ensuring compliance with all relevant legal obligations.

- Executive Manager Internal Audit and Complaints Resolution is the owner of this policy and is responsible (with the assistance of Governance and General Counsel) for coordinating and documenting Council's overall fraud and corruption control framework.

- Information and Digital Technology is responsible for coordinating with other fraud and risk functions to manage technology-enabled fraud.

- The Audit, Risk and Improvement Committee provides advice to the CEO about this policy and monitoring the fraud and corruption control framework.

- Executives and People leaders are responsible for taking a leadership role in promoting and sustaining ethical behaviour and culture.

- All level 5 Managers and above are responsible for receiving public interest disclosures, and the Complaints Resolution Team is responsible for investigating a disclosure.

- The Fraud and Corruption Control Committee is responsible for overseeing management of fraud and corruption complaints, and reporting quarterly to ARIC on the status of fraud and corruption complaints management and controls.

Requirements of employees and managers

In addition to complying with all integrity-related policies including the Code of Conduct, employees are expected to cooperate with all initiatives aimed at preventing, detecting, and responding to fraud and corruption. This includes risk assessments, training and education, audits and investigations and the design and implementation of controls.

Managers are also expected to:

- ensure all agreed controls aimed at preventing, detecting and responding to fraud and corruption are in place

- alert the policy owner of an y undocumented or emerging fraud and corruption risks

- ensure suppliers and contractors are aware of Council's policies and expectations in relation to fraud and corruption

- ensure all staff complete relevant training and are aware of fraud and corruption risks.

Reporting breaches

Any breaches of this Policy are managed under the Code of Conduct, Statement of Business Ethics or other related policies, as listed below.

What is fraud and corruption?

Fraud refers to dishonestly obtaining a benefit, or causing a loss, by deception or other means. In broad terms, corruption is deliberate, serious wrongdoing that involves dishonest or partial conduct, a breach of public trust or the misuse of information or material. A more detailed definition is found in sections 7, 8 and 9 of the *Independent Commission Against Corruption Act 1988*.

Scope and Application

This policy applies to all staff, councillors, volunteers, consultants, contractors (and employees of) working for or on behalf of Council, outsourced service providers performing work for Council, and committee and panel members.

References and Related Documents

- The Northern Beaches Council Code of Conduct

- Public Interest Disclosure Policy

- Managing Unsatisfactory Conduct Policy and Procedure

- Complaints Management Policy

- Statement of Business Ethics

- Fraud and Corruption Control Plan

Community Strategic Plan

This Council policy relates to the Community Strategic Plan Outcome of

- Good governance - Goal 19 Our Council is transparent and trusted to make decisions that reflect the values of the community

Responsible Officer

Executive Manager Internal Audit and Complaints Resolution

Review Date

Insert date four years from Council adoption (review once per Council term).

Revision History

Policy number	Date	Detail	TRIM #
	19 December 2019	Adopted by Council	2019/411482
NB-P-22	March 2024	Adopted by Council on 26 March 2024	2024/154746