



Lifestyle and opportunity @ your doorstep



Fraud and Corruption Prevention Policy

Document Version Control

Document Name:	Fraud and Corruption Prevention Policy
Content Manager Reference (Word):	D21/48227
Content Manager Reference (PDF)	D21/49435
Document Status:	Draft
Version Number:	Version 2.0
Date:	13 April 2021
Author:	Corporate Governance
Endorsed By:	Executive Team; Audit, Risk and Improvement Committee
Distribution:	Internal and External

Change History

Version	Issue Date	Author	Reason for Change
1.0	12 June 2008	Governance, Risk and Audit	Aligned with resolution of Council – 12 June 2008
1.1	29 August 2014	Governance, Risk and Audit	Aligned with Resolution of Council – 29 August 2014
1.2	24 October 2014	Governance, Risk and Audit	Revision for clarity, layout and best practice.
2.0	12 April 2021	Corporate Governance	Style and formatting changes to align with current Council templates Aligned with NSW Audit Office best practices.

Contents

1. Purpose.....	3
2. Scope.....	3
3. Responsibilities.....	3
4. References – Legislation and City of Ryde Policies	4

Fraud and Corruption prevention Policy		
Owner: Corporate Governance	Accountability: Governance and Risk Management Framework	Adopted by Council: TBC
CM Reference (PDF): D21/49435 CM Reference (Word): D21/48227	Next Review date: 13 April 2023	Last Review Date: 13 April 2021

1. Purpose

This policy forms part of a suite of documents that draw together the relevant initiatives, strategies and controls for encouraging ethical behaviour and combating fraud and corruption. Consistent with the Fraud and Corruption Prevention Strategy, this policy incorporates the Audit Office of NSW's fraud control framework. This framework is acknowledged as best practice by State and Local Government organisations.

This policy aims to:

- outline Council's fraud and corruption prevention, detection and response initiatives adopted by Council.
- promote the awareness of risks relating to fraud and corruption to Council officials employees and third-parties.
- develop appropriate strategies and internal controls to minimise losses due to fraud, and corruption to Council.

2. Scope

Fraud and corruption is a risk that all Corporate and Public Sector businesses are exposed to. City of Ryde does not tolerate any fraudulent or corrupt behaviour, as this is contrary to Council's core values, could breach its Code of Conduct Policy and Standards and may be unlawful.

This policy applies to all Council activities, and to all Council Officials and Employees as well as any third-party providers.

- Council Officials are defined (as per the Code of Conduct) as "Councillors, members of staff of a council, administrators, council committee members, delegates of council and, for the purposes of clause 4.16 of Council's Code of Conduct, council advisers".
- Employees for the purpose of this policy include all persons engaged to act on behalf of City of Ryde Council in an official capacity including staff members, contractors, consultants, sub-contractors and sub-consultants and volunteers.
- Third parties engaged in business with Council are expected to comply with this policy, per the Statement of Business Ethics.

Members of the public are expected to support Council's commitment to preventing and addressing fraudulent or corrupt behaviour by reporting it to the appropriate authority.

3. Responsibilities

Council will adopt a Fraud and Corruption Prevention Strategy.

The **Manager, Corporate Governance** is responsible for:

- Maintenance of an ongoing Internal Audit function in line with the program approved by the Audit Risk Improvement Committee (ARIC);
- Auditing and monitoring compliance with internal controls;
- Management reviews to check compliance;

Fraud and Corruption prevention Policy		
Owner: Corporate Governance	Accountability: Governance and Risk Management Framework	Adopted by Council: TBC
CM Reference (PDF): D21/49435 CM Reference (Word): D21/48227	Next Review date: 13 April 2023	Last Review Date: 13 April 2021

- Regularly conducting fraud risk assessments;
- Implementation of strategies to prevent or minimise the opportunity for fraud and corruption in Council activities;
- Implementation of formal procedures for investigation of allegations of dishonest, corrupt/or fraudulent behaviour;
- Prompt reporting of any matter to appropriate authorities, if the General Manager has a suspicion that there has been fraud and corruption;
- Commitment to taking action as appropriate and in accordance with the Code of Conduct and this policy and strategy;
- Provision of training to all staff on their obligations under this and associated policies such as the Code of Conduct;
- Implementation and management of a complaints handling process that allows whistle-blowers to make complaints anonymously

Council's **Executive Team** and **Leadership Team** are responsible for:

- Review and endorsement of this and other policies to ensure that Council officials and employees are aware of their responsibilities in combating fraud;
- Fostering an environment in which fraudulent and corrupt activity is discouraged.
- Participating in regular fraud and corruption prevention training

All **Council Officials, Employees** and **Third-Party Providers** are expected to:

- Actively comply with policies and procedures relating to fraud and corruption prevention
- Participate in fraud and corruption prevention training relevant to their role, as identified by their manager

A detailed strategy and framework to ensure these actions are implemented is outlined in the Fraud and Corruption Prevention Strategy.

Disciplinary Action

- Where **Councillors** are suspected and/or found to have engaged in corrupt and/or fraudulent activity, Council will take action including referral of the matter to the Office of Local Government in addition to any other in-house sanctions and/or legal action that may be required.
- **Employees** who are proven to have engaged in corrupt and/or fraudulent activity may be subject to disciplinary action including in-house sanctions, termination of employment, and/or legal action.
- **Third-Party Providers, Contractors and Volunteers** who are suspected and/or found to have engaged in corrupt and/or fraudulent activity may be subject to action by the Council including legal action.

4. References – Legislation and City of Ryde Policies

- City of Ryde Fraud and Corruption Prevention Strategy (D21/48238)
- City of Ryde Fraud and Corruption Action Plan (D21/7062)
- City of Ryde Statement of Business Ethics
- City of Ryde Code of Conduct Policy, Standards of Conduct, and Complaints Procedure

Fraud and Corruption prevention Policy		
Owner: Corporate Governance	Accountability: Governance and Risk Management Framework	Adopted by Council: TBC
CM Reference (PDF): D21/49435 CM Reference (Word): D21/48227	Next Review date: 13 April 2023	Last Review Date: 13 April 2021

- City of Ryde Public Interests Internal Reporting Policy and Procedure
- City of Ryde Gifts and Benefits Policy
- 'Better Practice Guide: Fraud Control – Developing an Effective Strategy' - Audit Office of NSW 1994 (updated June 2012)
- Fraud Control Improvement Kit – Managing your Fraud Control Obligations - Audit Office of NSW (February 2015)
- Fraud Control – Current Progress and Future Directions 2005 (updated October 2011)
- AS 8001-2008 – Fraud and Corruption Control – Standards Australia
- Fraud controls in local councils – Audit Office of NSW (June 2018)
- Managing corrupt conduct during the COVID-19 outbreak – ICAC NSW (April 2020)
- Corruption and integrity in the NSW public sector: an assessment of current trends and events – ICAC NSW (December 2018)
- Strengthening Employment Screening Practices in the NSW Public Sector - ICAC NSW (February 2018)

Fraud and Corruption prevention Policy		
Owner: Corporate Governance	Accountability: Governance and Risk Management Framework	Adopted by Council: TBC
CM Reference (PDF): D21/49435 CM Reference (Word): D21/48227	Next Review date: 13 April 2023	Last Review Date: 13 April 2021