Fraud and Corruption Awareness and Prevention Policy

Policy outcomes	Council has zero tolerance for fraud and corruption and is committed to protecting its reputation and assets from any attempt by employees or others to gain financial or other benefits by deceit or dishonest conduct. Council has established an organisational culture where transparency, accountability, integrity and stewardship are embraced. Council will ensure all employees and councillors have an awareness of expectations in relation to fraud and corruption and the process for reporting incidents. Any fraud or corruption event committed or attempted against the Council will be thoroughly investigated irrespective of the suspected wrongdoer's position, length of service or relationship to Council. Appropriate disciplinary and legal action may be taken against any employee involved in fraudulent or corrupt conduct. In addition, and where appropriate, any individual other than an employee involved in fraudulent or corrupt conduct will be prosecuted to the fullest extent of the law. Council will ensure that it has in place effective operational controls and procedures for the prevention, detection and effective response to fraudulent and corrupt conduct and support ongoing control activities to review key policies and procedures that form the foundation of a Fraud and Corruption Control System.
Responsible area	Governance and Organisational Performance
Version	2.0
Date approved / adopted	Endorsed by SRIA 11 June 2024 Reviewed by Audit and Risk Committee 9 July 2024 Agreed and Endorsed by Audit and Risk Committee 18 July 2024 Adopted by Council – 7 August 2024
Planned review date	June 2028

1. Purpose

Fraud and corruption is not tolerated at City of Port Phillip. Council is committed to protecting its reputation and assets from any attempt by employees or others to gain financial or other benefits by deceit or dishonest conduct.

The purpose of this policy is to help minimise the opportunity for fraudulent and corrupt activity to occur by ensuring all members of the organisation understand what it is, that it will not be tolerated and what their legal and moral obligations are in response to it.

2. The Policy outlines Council's commitment to fraud and corruption control awareness and prevention and outlines its approach to preventing, detecting, investigating and effectively responding to all instances of fraudulent and corrupt conduct.

3. This Policy applies to all Councillors, Council employees, contractors and volunteers engaged directly by the City of Port Phillip as well as its agents and contractors either engaged by Council or by an authorised contractor of the City of Port Phillip.

Responsibilities

Responsibility for the prevention and detection of fraud and corruption and for the implementation and operation of controls that minimise fraudulent and corrupt activity within their areas of responsibility rests with all levels of management, Councillors, staff, volunteers and agency or contract staff who represent Council.

Role	Responsibility
Councillors (Governing Body)	As part of their sworn oath (or affirmation) as elected representatives, Councillors have a duty to ensure that Council assets and resources are safeguarded from fraudulent and corrupt conduct, and to ensure that Council's powers, duties and responsibilities are exercised in an open, fair and proper manner to the highest standards of probity. Councillors must lead by example and genuinely commit to fraud and corruption control by raising awareness and ensuring that associated risks are considered in their dealings with the CEO, Council officers and members of the public. Reviewing and adopting this Policy.
Chief Executive Officer	The CEO has ultimate accountability for fraud and corruption control within Council and ensuring policies and procedures are followed and that appropriate governance structures are in place and are effective.

	Expeditiously reporting to IBAC, relevant agencies and the Audit and Risk Committee in accordance with this policy. Reporting incidents and outcomes of fraud and corruption events to the Audit & Risk Committee
Executive Leadership Team / SRIA	Ensuring Fraud and Corruption Control is embedded into Corporate risk management. Monitoring the implementation of this policy. Reviewing the annual risk assessment and assisting in establishing a Fraud and Corruption Control System. Championing ethical behavior and fraud and corruption awareness within Council. Assisting with the handling of any incidents as appropriate. Working in partnership with the Executive Manager Governance & Organisational Performance to ensure targeted training awareness for staff in high-risk areas is prioritized. Monitoring compliance with associated codes of conduct, policies and procedures. Receiving reports on actual incidences of fraud and corruption.
Audit and Risk Committee	Reviewing and endorsing this Policy and reviewing the effectiveness of the fraud and corruption control system. Considering the adequacy of actions taken to prevent, detect and respond to fraud and corruption through ongoing Internal Audit Program and Compliance activities. Receiving reports / updates on actual incidences of fraud and corruption and/or serious allegations. Ensuring fraud and corruption control is adequately considered in the Internal Audit and Core Compliance Plan and compliance activities.
External Auditors (VAGO) role in the detection of fraud and corruption	The Victorian Auditor General's Office (VAGO) is the external auditor for Port Phillip City Council. VAGO has an obligation to consider the risk of fraud and corruption in performing the external audit. Council will engage with

	VAGO in an open and collaborative manner to assist VAGO in the discharge of its obligations including: • Sharing findings of Council's fraud and corruption risk assessments and the results of any investigations undertaken into fraudulent or corrupt behavior; • Providing VAGO with Council's Fraud and Corruption Control system focusing on the importance Council places on fraud and corruption prevention; • Offering such assistance as the auditor may require enabling a more comprehensive understanding of Council's approach to fraud and corruption management.
Public Interest Disclosure Coordinator and officers	Receiving allegations of fraud and corruption (where the disclosure falls within the Public Interest Disclosure Act 2012). Refer to the below link for Council's Public Interest Disclosure Procedures and Roles and Responsibilities: Public Interest Disclosures (Whistle Blowing) - Council Intranet (portphillip.vic.gov.au)
Head of ICT Strategy and Information *** referenced in the standard as Information security management system (ISMS) professional*	DTS recognises the critical importance of safeguarding sensitive data, protecting the privacy of citizens, and maintaining the integrity of ICT systems. To achieve this, Council's ICT strategy encompasses robust security measures across all layers of infrastructure, applications, and processes. DTS will: • Prioritise proactive threat detection, continuous monitoring, and rapid response capabilities to mitigate fraud risks effectively; • Foster a culture of cybersecurity awareness by providing comprehensive training to employees; • Implement cyber best practices, adhering to compliance standards, and leveraging cutting-edge technologies.

Executive Manager Governance & Organisational Performance	Maintain oversight and review of Council's Fraud and Corruption Control System. Maintain oversight of investigations conducted by the Ombudsman, IBAC and other relevant external agencies. Maintain oversight over Council's Registers of Delegations. Maintain oversight over Council's Training and Awareness program/s relevant to this policy.
Coordinator Risk and Assurance	Responsible for reviewing and updating Council's Fraud and Corruption Awareness and Prevention Policy. Responsible for maintaining Council's confidential Fraud and Corruption Incident Register and the Fraud and Corruption Control System. Support the CEO in expeditiously reporting to IBAC, relevant agencies and the Audit and Risk Committee in accordance with this policy. Develop a fraud and corruption training and awareness program and ensure it is kept up to date by reviewing the e-learn module and other training material every 12 months, (in consultation with Head of Governance and Organisational Development). Coordinate the internal audit and core compliance program.
Executive Manager, People Culture and Safety	Provide oversight of the conduct for any related employee investigations and disciplinary processes in accordance with City of Port Phillip's Discipline Policy.
Managers, Heads Of, Coordinators, Leads and Team Leaders	Complying with this Policy and promoting awareness and compliance with this Policy to employees, contractors and volunteers who fall within the area of responsibility of their Department/Team, including monitoring completion of mandatory training. Identifying and documenting fraud and corruption risk as business as usual and after organisational change. Ensuring strong fraud and corruption risk controls exist, are recorded on their respective departmental operational risk

	registers and are complied with by all staff and frequently reviewed. Educating their employees about fraud and corruption controls and procedures following the detection of fraud and corruption. Continuously promoting ethical behavior by their actions and advice. Business owners / SMEs responsible for relevant training modules and training awareness are responsible for reviewing the module every 12 months and advising Learning and Development if any changes are required.
Council employees, contractors and volunteers	To be aware of and understand their obligations in identifying and reporting any risks, exposures or suspected fraudulent activities.

Fraud and Corruption prevention and detection

Pre-employment screening

A focus on the prevention of fraud and corruption incidents perpetrated by staff commences at the beginning of the City of Port Phillip (CoPP) employment journey. When a preferred applicant is selected by an interview panel, the Pre-Employment Screening process will take place.

This will include reference checks, and for all new employees evidence of Identity and National Police Checks (NPC). Employment screening is designed to minimise the risk of corruption and misconduct risks as well employing people who may be unsuitable for the role by assessing available information at a point in time.

Things to look for may include unexplained gaps in employment history, a pattern of short periods of employment with a series of employers not as contract work or a reluctance to produce referees from past employers/managers.

Supplier and customer vetting

In addition to potential employees, Council also vets prospective contractors as part of the public tender process. The depth of analysis is contingent on the level of risk and the value of the proposed procurement. The analysis conducted by a specialist organisation includes credit ratings, any legal actions, court actions, referee checks, business profiles, and provides a risk profile of directors of the business. The independent report is then reviewed and forms part of the tender assessment. Any reported frauds would be identified through this process.

Note, at the time of updating this policy, work is underway to expand the Contractors Consultant and Suppliers Code of Conduct to include reference to / or extracts from the Fraud and Corruption Awareness and Prevention Policy. (This section will be updated once the review has been completed).

Fostering an organisational culture of ethical behaviour

The most effective preventative measures against fraud and corruption are a well-informed and aware workforce, prepared to disclose any fraudulent or corrupt behaviour.

The CEO and Executive Leadership Team is responsible for promoting an anti-fraud and corruption culture throughout the organisation. Staff must be aware that all reports of fraud and corruption will be fully investigated, and appropriate action taken including possible dismissal, , reporting of fraudulent or corrupt activity to Victoria Police or another regulator and potential prosecution including recovery of any financial loss suffered by Council.

Training, Awareness and Communication (general / targeted)

Staff

Council acknowledges the primary role of staff in the prevention of fraud and corruption. To foster an appropriate fraud and corruption resistant culture, the organisation will implement fraud awareness training and adopt transparent and participative management practices that empower staff in their operational roles. Current training offered includes:

- Fraud and Corruption Awareness and prevention mandatory eLearn module in MyPath.
- Face to Face fraud and corruption training for those without access to a computer.
- Conflict of Interest – covered within Code of Conduct mandatory e-learn.
- Gifts and Hospitality – covered within Code of Conduct mandatory e-learn.
- Public Interest Disclosures – Targeted training provided on an as needs basis.
- Personal Interests Returns – impacted officers are provided with a set of guidelines and support from the Governance team.

There will be suitable induction training to enhance fraud and corruption resistance. Awareness of the available reporting mechanisms and Public Interest Discloser (Whistleblower) support will also be further reinforced through training programs and other means of communication such as via Council's intranet page. Training may be facilitated internally and/or via external providers.

Targeted training may be provided for staff working in business areas or functions where the risk of fraud is inherently high (e.g. areas utilising Credit Cards and Purchasing Cards undertake training on the use of the cards and reimbursement requirements).

Councillors

Councillors are required to participate in a mandatory induction program within four months of taking the oath or affirmation of office. Fraud and Corruption Awareness will be incorporated in future inductions, including for any potential by-elections.

This training will aim to inform Councillors of their obligations in relation to preventing fraud and corruption and embed a culture of integrity and compliance.

Fraud and Corruption risk management and assessment Process

Fraud and corruption risk management is integrated with Council's risk management framework and Operational / Corporate risk register.

A fraud and corruption risk assessment is undertaken at least annually with each manager as part of the full annual risk review process to identify weakness in controls and allow the organisation to identify high risk areas. These assessments will be used to improve any identified internal control weaknesses. There are often changes in a person's behaviour when perpetrating a fraud. Some of these behaviours are obvious however some are also subtle.

Red flag behaviours include (things to look out for):

- Excessive leave balances and refusal to commit to leave arrangements;
- Lifestyle changes – new car, expensive holiday;
- Buying gifts for others and shouting expensive lunches, etc.

Internal Controls (Fraud and Corruption Control System)

Council must maintain effective internal controls designed to prevent and detect fraud and corruption. These internal controls are outlined in the Fraud and Corruption Control System, (framework for controlling the risks of fraud and corruption against or by an organisation). These controls are subject to review by the Strategic Risk and Internal Audit Group (SRIA) and the Audit and Risk Committee to have oversight that they are effective and respond appropriately to the organisation's current risk profile.

Council must also maintain clearly documented procedures for its high-risk activities such as tendering, accounts payable and purchasing, and management of assets.

Common examples of internal controls include:

- Segregation of duties;
- Identification and declaration of conflict of interest;
- Adherence to and promotion of Council policies including Purchasing Policy, Procedures and checklists;
- Effective leadership – setting the tone at the top;
- Security (physical and information systems);
- Supervision (internal reviews);
- Approvals within delegated authority;
- Regular financial reconciliations;
- Sound budget control including regular reviews;
- Regular review of exception financial management reporting;
- Clear reporting lines;

- Annual Attestation.

Pressure Testing

The Standard AS 8001:2021 requires an organisation to implement procedures aimed at assessing the effectiveness of internal controls that are specifically designed or intended to mitigate fraud and corruption risks. Pressure testing involves an internal or external individual or team initiating a series of test transactions to assess the operational effectiveness of internal controls. This involves the introduction of documents, data or other action consistent with an actual fraud or corruption event, to determine if existing internal controls are operating as intended and are effective in preventing fraud or corruption of the type contemplated, and then observing how existing internal controls respond to such a test transaction. Examples of actions that can be used include submitting a 'false' invoice for payment, email communication to change the bank account details of a supplier or a telephone call to change the contact details of a client. Other examples of pressure tests include desktop review of case studies (IBAC, VAGO & Local Government Inspectorate etc.) process walk-throughs and data analysis / analytics. Pressure testing delivers a number of benefits including the following:

(a) Gaining a better understanding of different functions, programs and risks across the business.

(b) Providing assurance that internal controls designed to mitigate fraud and corruption risk are operating as intended.

(c) Closer internal working relationships.

(d) Increased fraud awareness, helping staff acknowledge the risk of fraud and the vulnerabilities of associated processes.

(e) Identifying and rectifying previously unknown control vulnerabilities.

Council will include pressure testing of fraud and corruption risk controls as part of its Legislative Compliance evidence-based controls effectiveness testing program which will be reported through SRIA.

Reporting of Breaches, Disclosures, Allegations and Investigations

Staff who come forward and report incidents of wrongdoing are helping to promote integrity, accountability and good management within Council. Staff / Contractors should report conduct which involves (or which they reasonably believe may involve) fraud, corrupt conduct, maladministration or serious and substantial waste of public money.

Anonymous reporting is not an encouraged practice, as anonymous allegations are difficult to pursue as generally further information is required. It is also a means to disguise vexatious or frivolous complaints.

However, City of Port Phillip does recognise that people have many reasons for remaining anonymous, and this should not eliminate these opportunities to prevent and/or detect fraud and corruption.

An Employee who makes a false disclosure, in addition to being guilty of an offence, may face disciplinary action that may include dismissal (see Discipline Policy)

The following issues will be considered when determining to what extent an anonymous disclosure will be investigated:

- Seriousness of the issue raised;
- Evidence provided;
- Prospects for further investigation;
- Fairness to the person being investigated.

Disclosures may be made to:

- The Public Interest Disclosures Coordinator or any of the Public Interest Disclosure Officers (as outlined in the Council's Public Interest Disclosure Procedures) Note that if the reported incident or allegation relates to either the CEO or a Councillor the disclosure must be made to the Public Interest Disclosures Coordinator for reporting directly to IBAC.
- Any member of the Leadership Network (Executive Leadership Team or department lead).
- The Coordinator Risk and Assurance.
- Independent Broad-Based Anti-Corruption Commission (IBAC) in accordance with the Public Interest Disclosures Act 2014 or the Independent Broad-based Anti-corruption commission Act 2011 (IBAC Act).

Council may act against anyone who takes reprisal action, particularly where the reprisal action is malicious or reckless, against a Council officer / Contractor who reports suspected or known incidents, consistent with Council's Public Interest Disclosures (Whistleblowers) Policy and Procedures. Any action will be determined by the CEO when it involves employees (Action against Contractors is currently under review)

Fraud and Corruption Incident Register

A confidential Fraud and Corruption Incident Register is maintained by the Coordinator Risk and Assurance and is used to record suspected or actual incidents of fraud or corruption. Incidents of fraud or corruption will be reported as confidential items in the Risk Management Update section of the SRIA agenda. Reporting can be completed confidentially and sent through to Coordinator Risk and Assurance either electronically or via internal mail marked "confidential".

All incidents related to fraud or corruption are reported to the CEO. However, the Audit and Risk Committee will only receive reports of actual substantiated fraud or corruption or any serious allegations of fraud or corruption (in accordance with Public Interest Disclosure Act requirements, where relevant).

Notification and Investigation Process

Where an incident of suspected fraudulent or corrupt conduct is reported, the officer receiving the report should:

- Make detailed notes about the circumstances of the incident by undertaking a preliminary assessment.
- Unless the matter is a Public Interest Disclosure pursuant to the Public Interest Disclosures Act 2012 (Vic), report the matter immediately to the CEO and the relevant General Manager / Director as well as the Executive Manager Governance & Organisational Performance for inclusion in the register.
- Quarantine, capture and collate digital and physical evidence.
- Maintain confidentiality at all times around all allegations raised and the identity of any individuals involved.
- Not attempt to personally undertake an investigation as generally Council will engage an external investigator.
- Not contact any staff members which are the subject of the allegations.
- Not discuss the complaint with any other staff members other than as directed by an authorised investigating officer.
- Not compromise the integrity of any evidence supporting allegations raised.
- Usually the Risk and Assurance Coordinator in conjunction with senior management will risk assess what the event will mean to the organisation and activate the response and recovery procedure. This group will also determine if action should be taken to suspend the suspected staff and remove their access both digital and physical.

IBAC Mandatory Notification

Mandatory notifications of public sector corruption were introduced in December 2016. This obligation is set out in Section 57 of the Independent Broad-based Anti-Corruption Commission Act 2011 Independent Broad-based Anti-Corruption Commission Act 2011 (the IBAC Act), requiring 'principal officers'* of a Public Sector body to notify IBAC on reasonable grounds of any matter they suspect is occurring or has occurred constituting corrupt conduct.

' principal officers – head of a department, agency or Council*

There is no legislative obligation for relevant principal officers to search out corrupt conduct, only report it when suspected. To meet the threshold for notification to IBAC, the conduct must:

1. Be corrupt conduct as defined in section 4 of the IBAC Act; and

2. Be an indictable offence or a prescribed common-law offence committed in Victoria; and

3. Lead a reasonable person to suspect that corrupt conduct has occurred or is occurring (reasonable suspicion).

The Coordinator Risk & Assurance is currently the City of Port Phillip nominated officer to report mandatory notifications to IBAC, utilizing the IBAC Mandatory notification form Mandatory

notifications | IBAC All information exchanged is authorized by the CEO &/or nominated delegated officer.

Investigation Outcome

Once an investigation has been finalised, the CEO will determine the appropriate course of action in consultation with the relevant General Manager, Executive Manager People, Culture & Safety and Manager Governance & Organisational Performance which may include:

- Disciplinary action.
- Referral to Victoria Police.
- Referral to another agency for investigation.
- Civil action.

The Executive Manager Governance & Organisational Performance and the Coordinator Risk and Assurance (or other delegated officer) shall work with relevant managers to ensure appropriate controls are introduced to prevent a reoccurrence of the issue.

Investigation may not always uncover all the perpetrators or obtain enough evidence for police, regulators or prosecution. But 'disruption' of the activity is recognised as an adequate response because it helps ensure such activities don't continue.

Notifying impacted third parties about fraud and corruption

Council has established a notification process to consider the impact of a fraud and corruption event on third parties. Third parties include customers, clients, Government services, law enforcement, community, environment, industry and national security. When a fraud or corruption event has been identified, Council will assess the possible impact on third parties and notify where deemed appropriate.

Crime and Fraud Insurance Arrangements

Council maintains a crime insurance policy , that forms part of the suite of insurances which Council administers. The policy is designed to respond to incidents of crime / fraud where Council has suffered a financial loss including employee fraud, computer (cyber) fraud, identity fraud, credit card fraud and forgery, etc.

The extent of coverage and applicable excess is reviewed each year at renewal. In order to ensure that council has notified insurers of any potential criminal or fraudulent activity, an annual risk and insurance attestation is forwarded to all managers to ensure disclosure of circumstances or confirmation of incidents previously reported in the financial year are appropriately recorded and reported.

4. Supplementary policy documents

The Fraud and Corruption Awareness and Prevention Policy is one of a suite of policies and procedures designed to minimise the incidence of corrupt conduct in the workplace. This Policy should be read in conjunction with other related policies and procedures which together form the Fraud and Corruption Control System, including but not limited to:

City of Port Phillip Fraud and Corruption Control Plan

Integrity Framework (In Draft)

Discipline Policy, Guidelines and Procedures

Employee Code of Conduct (including Council's Gift & Hospitality Policy)

Councillor Code of Conduct (including Council's Gift & Hospitality Policy)

Procurement Policy

Corporate Credit Card Policy

Conflict of Interest Policy including (Gifts and Hospitality)

Recruitment and Selection Policy

Public Interest Disclosure Procedure

Risk Management Policy and Framework

Risk Management Principles and Guidelines AS/NZS ISO 31000-2018

Risk Register

Fraud and Corruption Incident Register

Audit and Risk Committee Charter

Normative references

(Some contents of the following documents are referred to in this Policy however this does not indicate total compliance)

AS ISO 37001, Anti-bribery management systems — Requirements with guidance for use AS ISO/IEC 27001, Information technology — Security techniques — Information security management systems

5. Related legislation and documents

The following legislation establishes Council's accountability and integrity framework and determines key requirements to ensure fraudulent and corrupt conduct is not tolerated.

Local Government Act

Crimes Act Victoria

Australian Standard AS8001-2008 – Fraud and Corruption Control AS 8001:2021 Fraud and Corruption Control

Public Interest Disclosure Act 2012 (Vic)

Independent Broad-based Anti-Corruption Commission (IBAC) Act 2011

Ombudsman Act 1973

Audit Act 1994

Privacy and Data Protection Act

6. Definitions

Term	Definition
Bribery (subset of corruption)	Offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person's duties Examples of acts of fraud include (but are not limited to): • A council officer or councillor accepts a financial incentive to provide contract specifications in a tender ahead of time. • Offering a cash incentive to procurement staff to sway their decision on a tender in favour of the paying vendor. • A member of the Rates Team being offered cash to provide details of certain people addresses within the municipality.
Business associate	External party with whom the organization has, or plans to establish, some form of business relationship including outsourcing providers, contractors, sub-contractors and consultants. (refer Supplier and customer vetting)
Fraud -– External	The Australian Standard for fraud and corruption control AS 8001:2021 defines fraud as: **Externally instigated fraud** Fraudulent activity where no perpetrator is employed by or has a close association with the target organisation. (For example • Cyber-attack including attempts to destroy, expose, alter, disable, steal or gain unauthorized access to or make unauthorized use of an asset)

Term	Definition
	• False invoicing, involving a person with no connection to the target organization creating a fictitious invoice claiming payment for goods or services not delivered. • Unauthorised access to the bank account of the target organization and transfer to a fictitious bank account. often initiated by way of a “phishing” or “spear-phishing” malware distribution
Fraud	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 where 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 personal financial benefit. While conduct must be dishonest for it to meet the definition of “fraud” the conduct need not necessarily represent a breach of the criminal law. Examples of acts of fraud include (but are not limited to): • theft of plant and equipment • theft of inventory • false invoicing (creating a fictitious invoice claiming payment for goods or services not delivered or exaggerating the value of goods delivered or services provided) • theft of funds or cash (usually involving some form of concealment) • accounts receivable fraud (misappropriation or misdirection of remittances received by an entity from a debtor) • credit card fraud involving the unauthorised use of a credit card, credit card number issued to another person or the use of stolen or fraudulently generated credit card numbers by merchants. • theft of intellectual property or other confidential information • release or use of misleading or inaccurate information for the purposes of deceiving, misleading or to hide wrongdoing. • misuse of position in order to gain some form of financial advantage.
Corruption	The Australian Standard for fraud and corruption control AS 8001:2021 defines corruption as:

Term	Definition
	Dishonest activity in which a person associated with an organization (e.g. director, executive, manager, employee or contractor) acts contrary to the interests of the organization and abuses their position of trust in order to achieve personal advantage or advantage for another person or organization. This can also involve corrupt conduct by the organization, or a person purporting to act on behalf of and in the interests of the organization, in order to secure some form of improper advantage for the organization either directly or indirectly Examples of Corruption include (but are not limited to): • taking or offering bribes • dishonestly using influence • Serious conflict of interest involving a senior executive of an entity or other entity acting in his or her own self-interest rather than the interests of the entity to which he or she has been appointed • misusing information or material acquired at work (to confer an improper advantage or disadvantage on a person) • conspiring or attempting to engage in the above corrupt activity. Corruption can occur through: • improper or unlawful actions or inactions • actions of private individuals who try to improperly influence council functions or decisions. Examples of acts of corruption include (but are not limited to) the following: • disclosing tender bids to competing tenderers before a tender closes; • accepting payments to make planning decisions in a particular way; • providing family and close friends with preference; • While conduct must be dishonest for it to meet the definition of corruption, the conduct does not necessarily represent a breach of the law.
Information security	Preservation of confidentiality, integrity and availability of information

Term	Definition
Information security management system (ISMS) professional	Person who establishes, implements, maintains and continuously improves one or more information security management system processes
Information security management system (ISMS)	Part of the overall management system, based on a business risk approach, that establishes, implements, operates, monitors, reviews, maintains and improves information security
Governing body (Council)	A group or body that has the ultimate responsibility and authority for an organisation's activities, governance and policies and to which top management reports and by which top management is held accountable.
Investigation	Investigation means a search for evidence connecting or tending to connect a person (either a natural person or a body corporate) with conduct that is dishonest and / or infringes the criminal law or the policies and standards set by the Council.

7. Document history

Version	Date of approval/adoption	Changes made	ECM record
Fraud and Corruption Control Policy	June 2017	Ver 1.2 - Update reflects Council's current operating environment.	16/11/17
Fraud and Corruption Awareness & Prevention Policy	May 2020	Ver 1.3 - Update reflects Council's current operating environment, includes feedback from Fraud Internal Audit Nov 2018 and better aligns with the Fraud and Corruption Control standard AS8001-2008.	98/01/37
Fraud and Corruption Awareness & Prevention Policy	August 2024	Ver 2.0 - Update reflects Council's current operating environment, compliance with the updated Fraud and Corruption Control Standard AS8001-2021 and includes feedback from the Fraud Internal Audit July 2023.	98/01/37