

Fraud, Corruption, Misconduct and Maladministration Prevention Policy

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Related Documents	Code of Conduct for Employees Behaviour Management Policy Council Members Allowances, Benefits, Support and Facilities Policy Procurement Policy Public Interest Disclosure Policy Public Interest Disclosure Procedure Internal Review of Council Decisions Risk Management and Financial Internal Control Procedures
Applicable Legislation	<i>Local Government Act 1999</i> <i>Local Government (Elections) Act 1999</i> <i>Local Government (Accountability Framework) Act 2009</i> <i>Development Act 1993</i> <i>Planning, Development and Infrastructure Act 2016</i> <i>Behavioural Standards for Council Members – Gazetted 17 November 2022</i> <i>Independent Commission Against Corruption (ICAC) Act 2012</i> <i>Criminal Law Consolidation Act 1935</i> <i>Public Interest Disclosure Act 2018</i> <i>Ombudsman Act 1972</i>

1. Introduction

- 1.1 The Alexandrina Council is committed to acting in the best interest of the community and to upholding the principles of honesty, integrity, and transparency, which are all key components of good governance.
- 1.2 The Council recognises that fraud, corruption, misconduct and maladministration in public administration have the potential to cause significant financial and non-financial harm. The prevention and control of fraud, corruption, misconduct and maladministration should therefore feature predominantly within the systems and procedures of a responsible Council.

2. Policy Statement

- 2.1 This Policy is designed to protect public funds and assets, and the integrity, security and reputation of the Council.

- 2.2 This Policy outlines the Council's approach to the prevention, detection and control of fraudulent and/or corrupt activity and, summarises the associated responsibilities of Council Members and Council Employees.
- 2.3 The Council will not tolerate fraudulent or corrupt activity and is committed to its control and prevention by:
- complying with the requirements of the *Independent Commission Against Corruption Act 2012 (ICAC Act)*.
 - establishing and maintaining an effective system of internal controls and enforcing compliance with those controls.
 - regularly undertaking risk assessments to identify circumstances in which fraud, corruption, misconduct and maladministration could potentially occur.
 - implementing fraud and corruption prevention and mitigation strategies in its day to day operations.
 - taking appropriate action in response to allegations of fraudulent and/or corrupt activity including, reporting allegations in accordance with the ICAC Act and the reporting system established by the Independent Commissioner Against Corruption under section 20 of the ICAC Act and where allegations are substantiated, in addition to applicable criminal sanctions, may take disciplinary action in accordance with the Behaviour Management Policy and the Code of Conduct for Council Employees or, if relevant, a Council Employee's contract of employment with the Council.
 - ensuring all Council Employees and Council Members are aware of their obligations in regard to the prevention of fraud, corruption, misconduct and maladministration within the Council and the inclusion of preliminary education in any induction process.
 - active participation in education and evaluation of practices relevant to fraud, corruption, misconduct and maladministration.
 - fostering an ethical environment in which dishonest and fraudulent behaviour is actively discouraged.
 - generating community awareness of the Council's commitment to the prevention of fraud, corruption, misconduct and maladministration.

3. Scope

- 3.1 This Policy is intended to complement and be implemented in conjunction with other Council policies, including:
- Procurement Policy
 - Public Interest Disclosure Policy
 - Public Interest Disclosure Procedure
 - Risk Management Policy
 - Financial Internal Control Policy
 - Code of Conduct for Employees
 - Behaviour Management Policy

- Behaviour Management Standards for Council Members
- Council Members Allowances, Benefits, Support and Facilities Policy.

3.2 This Policy applies to all disclosures that relate to the actual or suspected occurrence of fraud, corruption, misconduct, and maladministration within the Council.

4. Definitions

For the purposes of this Policy the following definitions apply:

Commissioner means the person holding or acting in the office of the Independent Commissioner Against Corruption per section 4 of the ICAC Act, who has the powers and functions described at section 7 of the ICAC Act.

Corruption in public administration is defined in section 5(1) of the ICAC Act and means conduct that constitutes:

- (a) an offence against Part 7 Division 4 (Offences relating to public officers) of the *Criminal Law Consolidation Act 1935*, which includes the following offences:
 - bribery or corruption of public officers
 - threats or reprisals against public officers
 - abuse of public office
 - demanding or requiring benefit on basis of public office
 - offences relating to appointment to public office, or
- (b) an offence against the *Public Sector (Honesty and Accountability) Act 1995* or the *Public Corporations Act 1993*, or an attempt to commit such an offence, or
- (c) an offence against the *Lobbyist Act 1995*, or an attempt to commit such an offence, or
- (d) any other offence (including an offence against Part 5 (Offences of dishonesty) of the *Criminal Law Consolidation Act 1935* committed by a public officer while acting in their capacity as a public officer or by a former public officer and related to their former capacity as a public officer, or by a person before becoming a public officer and related to their capacity as a public officer, or an attempt to commit such an offence, or
- (d) any of the following in relation to an offence referred to in a preceding paragraph:
 - aiding, abetting, counselling, or procuring the commission of the offence,
 - inducing, whether by threats or promises or otherwise, the commission of the offence,
 - being in any way, directly or indirectly, knowingly concerned in, or party to, the commission of the offence,
 - conspiring with others to effect the commission of the offence.

Council means Alexandrina Council.

Directions and Guidelines is a reference to the Directions and Guidelines issued pursuant to section 20 of the ICAC Act and/or section 14 of the *Public Interest Disclosure Act 2018*, which are available on the Commissioner's website (www.icac.sa.gov.au).

Disclosure means an appropriate disclosure of public interest information made by an Informant to a Relevant Authority.

A person makes an appropriate disclosure of environmental and health information if:

- (a) the person:
 - i. believes on reasonable grounds that the information is true, or
 - ii. is not in a position to form a belief on reasonable grounds about the truth of the information, but believes on reasonable grounds that the information may be true and is of sufficient significance to justify its disclosure so that its truth may be investigated, and
- (b) the disclosure is made to a Relevant Authority.

A person makes an appropriate disclosure of public administration information if:

- (a) the person:
 - i. is a public officer,
 - ii. reasonably suspects that the information raises a potential issue of corruption, misconduct, or maladministration in public administration, and
- (b) the disclosure is made to a Relevant Authority.

Employee means any person employed or engaged by Council, or who carries out work for or on behalf of Council, in any capacity. This includes people employed directly by Council on a full-time, part-time, casual, permanent, fixed-term, temporary or contractual basis, as well as apprentices, trainees, secondees, volunteers, work experience students, contractors, subcontractors, employees of contractors or subcontractors, labour hire workers, consultants, other authorised personnel, and any other person providing services to, or on behalf of, Council, whether or not they are employed by another party.

False Disclosure is a disclosure of information relating to fraud or corruption, Maladministration or Misconduct that is made by a person who knows the information to be false or, who is reckless as to whether it is false.

Fraud is an intentional dishonest act or omission done with the purpose of deceiving.

Note: unlike "corruption" there is no statutory definition of 'fraud'. Fraud is a style of offending. The offences addressed under Part 5 and Part 6 of the Criminal Law Consolidation Act 1935 are considered to constitute fraud offences.

ICAC Act is the *Independent Commission Against Corruption Act 2012*.

Maladministration in public administration is defined in section 4(2) of the *Ombudsman Act 1972* and

- (a) means:
 - i. conduct of a public officer, or a practice, policy, or procedure of a public authority, that results in an irregular and unauthorised use of public money or substantial mismanagement of public resource, or
 - ii. conduct of a public officer involving substantial mismanagement in or in relation to the performance of official functions.

- (b) includes conduct resulting from impropriety, incompetence, or negligence, and
- (c) is to be assessed having regard to relevant statutory provisions and administrative instructions and directions.

Manager means any Employee of the Council who is responsible for the direct supervision of other Employees, and/or, for the management of a Council Department.

Misconduct in public administration is defined in section 4(1) of the *Ombudsman Act 1972* and means:

- (a) an intentional and serious contravention of a code of conduct by a public officer while acting in their capacity as a public officer that constitutes a ground for disciplinary action against the officer.

Office for Public Integrity (OPI) is the office established under the ICAC Act that has the function to:

- (a) receive and assess complaints about public administration from members of the public,
- (b) receive and assess reports about corruption, misconduct, and maladministration in public administration from inquiry agencies (the Ombudsman), public authorities (the Council) and public officers,
- (c) refer complaints and reports to inquiry agencies, public authorities and public officers or to determine to take no action in accordance with part 3, division 1 of the ICAC Act.

PID Act means *Public Interest Disclosure Act 2018*

Public administration defined at section 4 of the ICAC Act and, without limiting the acts that may comprise public administration, an administrative act within the meaning of the *Ombudsman Act 1972* will be taken to be carried out in the course of public administration.

Public administration information means information that raises a potential issue of corruption, misconduct or maladministration in public administration.

Public interest information means environmental or health information, or public administration information.

Public Officer has the meaning given by section 4 and Schedule 1 of the ICAC Act, and includes:

- a Council Member
- a member of a Council committee, and
- an employee or officer of the Council.

Relevant Authority for the purpose of the PID Act means the person or entity that receives an appropriate disclosure of public interest information in accordance with the PID Act.

Responsible Officer is a person who has completed any training courses approved by the Commissioner for the purpose of the *Public Interest Disclosure Regulations 2019* and has been designated by Council as a responsible officer under section 12 of the PID Act.

5. Prevention

5.1 The Council recognises that:

- (a) the occurrence of fraud, corruption, misconduct and maladministration will be more likely to prevail in an administrative environment where opportunities exist for waste and abuse.
- (b) the most effective way to prevent the occurrence of fraud, corruption, misconduct and maladministration is to install and continually reinforce a culture across the Council of acting lawfully, ethically and in a socially responsible manner, and to support this culture with the implementation or appropriate internal control mechanisms.

5.2 In general, the Council expects that employees and Council Members will assist in facilitating a sound ethical culture and preventing fraud, corruption, misconduct and maladministration by:

- understanding the responsibilities of their position.
- familiarising themselves with the Councils policies and procedures and adhering to them.
- understanding what behaviour constitutes fraudulent or corrupt conduct, misconduct and/or maladministration.
- maintaining an awareness of the strategies that have been implemented by the Council to minimise fraud, corruption, misconduct, and maladministration.
- being continuously vigilant to the potential for fraud, corruption, misconduct and maladministration to occur in the Council environment, and
- reporting suspected or actual occurrences of fraud, corruption, misconduct and maladministration in accordance with this Policy.

5.3 Specific Responsibilities:

5.3.1 Collectively, as the decision making body of the Council, Council Members are responsible for ensuring that the Council:

- promotes community awareness of the Council's commitment to the prevention of fraud, corruption, misconduct and maladministration.
- provides adequate security for the prevention of fraud, corruption, misconduct and maladministration. This includes the provision of secure facilities for storage of assets, and procedures to deter fraudulent or corrupt activity from occurring.
- provides mechanisms for receiving allegations of fraud or corruption, including by ensuring a Responsible Officer is appointed (see Public Interest Disclosure Policy).
- ensures that, where appropriate, proper investigations are conducted into allegations that involve fraud, corruption, misconduct or maladministration
- makes reports in accordance with this Policy and facilitates cooperation with any investigation undertaken by an external authority (such as SAPOL or the Commissioner).
- ensures that all employees are aware of their responsibilities in relation to fraud, corruption, misconduct and maladministration through the provision of appropriate and regular training.

- promotes a culture and environment in which fraud, corruption, misconduct and maladministration is actively discouraged and is readily reported should it occur.
- undertakes a fraud, corruption, misconduct and maladministration risk assessment on a regular basis.

5.4 Managers are responsible for:

- the conduct of any employees whom they supervise and, will be held accountable for such.
- any property under their control and, will be held accountable for such.
- reporting in accordance with this Policy.
- creating an environment in which fraud, corruption, misconduct, and maladministration is discouraged and readily reported by employees. Such an environment shall be fostered by the Manager's own attitude and behaviours to fraud, corruption, misconduct and maladministration and, by the accountability and integrity they both display and encourage from other employees.
- ensuring that new employees for whom they are responsible are aware of their responsibilities in relation to fraud, misconduct and maladministration and, of the standard of conduct expected from all employees as outlined in the Council's Employee Code of Conduct and this Policy.
- identifying potential fraud, corruption, misconduct, and maladministration risks.
- leading by example to promote ethical behaviour.

5.5 Employees are responsible for:

- performing their functions and duties with care, diligence, honesty, and integrity.
- conducting themselves in a professional manner at all times.
- adhering to these guidelines and other Council procedures that have been established to prevent fraud, corruption, misconduct or maladministration.
- taking care for Council's property which includes avoiding the waste or misuse of the Council's resources.
- maintaining and enhancing the reputation of the Council.
- remaining scrupulous in their use of the Council information, assets, funds, property, goods, or services.
- reporting in accordance with this Policy.

6. Fraud, Corruption, Misconduct and Maladministration Risk Assessment Process

6.1 The Council's main objective in the prevention and control of fraud, corruption, misconduct, and maladministration is to minimise the occurrence of fraud, corruption, misconduct, and maladministration within the Council. This objective is generally achieved by:

- identifying fraud, corruption, misconduct, and maladministration Risks.
- determining strategies to control those risks.
- defining responsibility for and, the time frame within which the strategies will be implemented.

6.2 Managers must be alert to the potential of fraud and corruption to occur and remain wary of factors which may leave the Council vulnerable to fraud and corruption, including:

- changes to Council delegations.
- implementation of cost cutting measures.
- contracting out and outsourcing.
- the impact of new technology.
- changes to risk management practices.

7. Reporting Corruption, misconduct, and maladministration in public administration

7.1 Reports by employees or Council Members to the OPI.

7.2 Any employee or Council Member who has or acquires knowledge of actual or suspected corruption in the Council or in other public administration must report this information to the OPI as soon as practicable.

7.3 All reasonable suspicions of corruption must be reported to the OPI in accordance with the Commissioner's reporting requirements as identified in the Commissioner's Directions and Guidelines ([OPI Directions and Guidelines](#)).

7.4 A report to the OPI must be made using the online report form available at: <https://www.publicintegrity.sa.gov.au>.

7.5 Nothing in this section is intended to prevent an employee or Council Member from reporting suspected Corruption or systematic or serious misconduct or maladministration in the Council or in other public administration to a Relevant Authority, like a Council's Responsible Officer, for the purpose of the PID Act. Such a disclosure may be protected under the PID Act and, if made to the Council's Responsible Officer, will be managed in accordance with the Council's Public Interest Disclosure Policy and Procedure. Public Officers are encouraged to have regard to the Council's Public Interest Disclosure Procedure when determining where to direct a disclosure.

7.6 Complaints and reports about misconduct and maladministration may also be made to the [Ombudsman SA](#).

7.6 Further information about appropriate complaint agencies is available at the OPI website.

8. Reporting Fraud, Misconduct or Maladministration

8.1 Where an employee, Council Member, contractor, or volunteer has or acquires knowledge of actual or suspected fraud or other similar conduct that does not constitute corruption, misconduct, or maladministration (and is therefore not required to be reported to the OPI), that knowledge should be reported to the Council's Responsible Officer. Such a disclosure may be protected under the PID Act and will be managed in accordance with the Council's Public Interest Disclosure Policy and Public Interest Disclosure Procedure.

Type of Conduct	Misconduct	Intentional and serious misconduct	Maladministration	Corruption
Examples of behaviour	Contravention of a code of conduct Not managing gifts and benefits properly Misconduct while acting in their capacity of public officer	Misuse of confidential information Conflict of interest Inappropriate HR practices	Unauthorised use of public money Substantial mismanagement of public resources Noncompliance of procurement processes	Bribery Abuse of public office Demanding or requiring benefit
Standards	<i>Local Government Act</i> Employee Code of Conduct Volunteer Code of Conduct Behaviour Management Policy Ministerial Behaviour Standards	<i>Local Government Act</i> <i>Ombudsman Act</i>	<i>Ombudsman Act 1972</i> <i>Independent Commission Against Corruption Act 2012</i>	<i>Criminal Law Consolidation Act 1935</i> <i>Public Sector (Honesty and Accountability) Act 1995</i> <i>Lobbyists Act 2015</i>
Investigative Body	Council using - Code of Conducts and Behaviour Management Policy	Ombudsman SA	Ombudsman SA	Office for Public Integrity (OPI)

9. Action by the Chief Executive Officer

- 9.1 Unless otherwise directed by OPI or SAPOL, the CEO (or their delegate) will investigate how the alleged corruption, fraud, misconduct, or maladministration occurred to determine the cause for the breakdown in controls and identify if any recommendations as to changes in policies, procedures or internal controls should be made to the Council. The investigation should:
- 9.1.1 occur as soon as practicable after the alleged incident, and
 - 9.1.2 not impose on or detract from any investigation being undertaken by the OPI or SAPOL.
 - 9.1.3 have regard to any recommendations in any report received from the Commissioner or SAPOL on the incident.
- 9.2 The CEO will, in conducting the investigation and deciding whether and how to report on the investigation to Council, have regard to the provisions of the Public Interest Disclosure Policy, and any confidentiality requirements under the PID Act and/or ICAC Act.

- 9.3 Action taken by the CEO following an investigation into alleged corruption, fraud, misconduct or maladministration may include disciplinary action against any employee involved in the incident.

10. False Disclosure

- 10.1 A person who knowingly makes a false disclosure or a false or misleading statement in a complaint or report will be guilty of an offence under section 18D of the ICAC Act, section 12G of the Ombudsman Act and/or section 10 of the PID Act. All three carry a maximum penalty of up to \$20,000 or imprisonment for 2 years.
- 10.2 An employee who makes a false disclosure, may also face disciplinary action which may include dismissal from employment.

11. Educating for Awareness

- 11.1 The Council recognises that the success and credibility of this Policy will largely depend upon how effectively it is communicated throughout the organisation and beyond.
- 11.2 The Council will, therefore, from time to time take proactive steps towards ensuring that the wider community is aware of the Council's zero-tolerance stance towards fraud, corruption, misconduct and maladministration, including by:
- 11.2.1 promoting the Council's initiatives and policies regarding the control and prevention of fraud, corruption, misconduct and maladministration on the Council's website and at the Council's offices.
 - 11.2.2 referring to the Council's fraud, corruption, misconduct and maladministration initiatives in the Council's Annual Report.
 - 11.2.3 facilitating public access to all of the documents that constitute the Council's fraud, corruption, misconduct and maladministration framework.
- 11.3 The Council has established a number of procedures to assist with the prevention and control of fraud, corruption, misconduct and maladministration. The effectiveness of these procedures will be continuously reviewed and assessed and will remain up to date with any future developments in fraud, corruption, misconduct and maladministration prevention and control techniques.

12. Availability of Policy

- 12.1 This Policy will be available for inspection the Council's website www.alexandrina.sa.gov.au. Copies will also be provided to interested members of the community upon request, and upon payment of a fee in accordance with Council's Schedule of Fees and Charges.

APPENDIX 1

OFFENCES

Local Government Act 1999

Council Members

Chapter 5 – Members of council

Part 4 - Member integrity and behaviour

- 62(3) A member or former member of a Council must not, whether within or outside the State, make improper use of information acquired by virtue of his or her position as a member of the Council to gain, directly or indirectly, an advantage for himself or herself or for another person or to cause detriment to the Council.
- 62(4) A member of a Council must not, whether within or outside the State, make improper use of his or her position as a member of the Council to gain, directly or indirectly, an advantage for himself or herself or for another person or to cause detriment to the Council.
- 62(4a) A member or former member of a council must not disclose information or a document –
- (a) in relation to which there is an order of a council or council committee effect under section 90 or 91(7) requiring the information or document to be treated confidentially, or
 - (b) That the member or former member know, or ought reasonably to know, is information or a document that is otherwise required to be treated confidentially.
- 69 Provision of false information
- A member of a Council who submits a return under subdivision 2 – Register of Interests and Schedule 3 of the *Local Government Act 1999*, that is to the knowledge of the member false or misleading in a material particular (whether by reason of information included in or omitted from the return) is guilty of an offence.
- 71 Restrictions on publication
- 71(1) A person must not –
- (a) publish information derived from a Register unless the information constitutes a fair and accurate summary of the information contained in the Register and is published in the public interest, or
 - (b) comment on the facts set forth in a Register, unless the comment is fair and published in the public interest and without malice.
- 71(2) If information or comment is published by a person in contravention of subsection (1), the person, and any other person who authorised the publication of the information or comment, is guilty of an offence.

Maximum Penalty: \$15,000

Council Employees

Chapter 7 – Council Employees

Part 4 – Employee integrity and behaviour

Subdivision 2 – Register of Interests

117 Provision of false information

A person who submits a return under Chapter 7 Part 4 Division 1 Subdivision 2 - Register of Interests that is to the knowledge of the officer false or misleading in a material particular (whether by reason of information included in or omitted from the return) is guilty of an offence.

119 Restrictions on disclosure

119(1) A person must not disclose to any other person any information furnished pursuant to this Subdivision unless the disclosure –

- (a) is necessary for the purpose of the preparation or use of the Register by the Chief Executive, or
- (b) is made at a meeting of the Council, a Council Committee or a Subsidiary of the council.

Subdivision 3 – Conflict of Interest

120 Conflict of Interest

120(1) The Chief Executive Officer of a Council who has an interest in a matter in relation to which he or she is required or authorised to act in the course of official duties –

- (a) must disclose the interest to the Council, and
- (b) must not, unless the Council otherwise determines during a Council meeting that is open to the public, act in relation to the matter.

120(2) An employee of the Council (other than the Chief Executive Officer) who has an interest in a matter in relation to which he or she is required or authorised to act in the course of official duties –

- (a) must disclose the interest to the Council, and
- (b) must not, unless the Council otherwise determines during a Council meeting that is open to the public, act in relation to the matter.

120(4) If an employee is entitled to act in relation to a matter by virtue of subsection 120(2)(b) and the employee is providing advice or making recommendations to the Council or a Council Committee on the matter, the employee must also disclose the relevant interest to the Council or Council Committee.

Chapter 8 – Administrative and financial accountability

Division 4 – Audit

130 CEO to Assist Auditor

130(1) The Chief Executive Officer must, at the request of the auditor of the Council, produce to the auditor for inspection the accounts, accounting records and other

documents relating to the financial affairs or internal controls of the Council, or to any other matter that is being examined or considered by the auditor.

130(2) The Chief Executive Officer must, at the request of the auditor of the Council, provide to the auditor explanations or information required by the auditor.

130(3) A Chief Executive Officer must not, without reasonable excuse, fail to comply with subsection (1) or (2).

Maximum Penalty: \$10,000

Division 5 – Other investigations

130A Other Investigations

130A(4) The Chief Executive Officer must, at the request of a person conducting an examination under section 130A(1) –

- (a) produce to the person for inspection any documents relating to the examination,
- (b) provide to the person explanations or information required by the person.

Maximum Penalty: \$10,000

Chapter 12 – Regulatory functions

Part 3 – Authorised persons

261 Powers under this Act

261(10) An authorised person, or a person assisting an authorised person, who –

- (a) addresses offensive language to any other person, or
- (b) without lawful authority hinders or obstructions or uses or threatens to use force in relation to any other person,

is guilty of an offence.

Maximum Penalty: \$5,000

Local Government (Elections) Act 1999

Part 12 – Illegal practices

65 Conduct of officers

An electoral officer must not fail, without proper excuse, to carry out his or her official duties in connection with the conduct of an election or poll.

Maximum Penalty: \$2,500 or imprisonment for six months

Part 14 – Campaign donations

Division 1 – Returns

85 Offences

85(1) A person who fails to furnish a return that the person is required to furnish under this Division within the time required by this Division is guilty of an offence.

Maximum Penalty: \$10,000

- 85(2) A person who furnishes a return or other information –
- (a) that the person is required to furnish under this Division, and
 - (b) that contains a statement that is, to the knowledge of the person, false or misleading in a material particular,

is guilty of an offence.

Maximum Penalty: \$10,000

Part 15 – Miscellaneous

91 Elected person refusing to act

A duly qualified person who, having been duly appointed or elected as a member of a council –

- (a) refuses to assume office and to act in it, or
- (b) neglects to assume the office and to act in it for the first three ordinary meetings of the council (without leave of the council),

is guilty of an offence.

Maximum Penalty: \$750

Responsibilities and accountability for Fraud, Corruption, Misconduct and Maladministration prevention actions

Responsibility		Council Members	Chief Executive Officer	Managers	Employees	Audit and Risk Committees	Other (e.g., certain contractors and volunteers)
Governance and ethics							
1	Comply with this policy and any related legislation, policy, protocol or procedure.	✓	✓	✓	✓	✓	✓
2	At all times in the performance of duties or in association with their role with Council, act in an ethical manner.	✓	✓	✓	✓	✓	✓
3	Promote a culture and environment in which Fraud, Corruption, Misconduct and Maladministration is discouraged and not tolerated.	✓	✓	✓	✓		✓
4	Remain scrupulous in the use of Council information, assets, funds, property, goods, or services.	✓	✓	✓	✓	✓	✓
Awareness and training							
1	Promote community awareness of the Council's commitment to the prevention of Fraud, Corruption, Misconduct and Maladministration.	✓	✓		✓ (as appropriate)		
2	Executive employees and managers ensure all employees under their supervision have been educated regarding Fraud, Corruption, Maladministration and Misconduct.		✓	✓	✓		

Responsibility		Council Members	Chief Executive Officer	Managers	Employees	Audit and Risk Committees	Other (e.g., certain contractors and volunteers)
3	Undertake awareness training or education regarding Fraud, Corruption, Maladministration and Misconduct.	✓	✓	✓	✓	✓	✓ (as appropriate)
4	Develop and deliver training to employees and other public officers to promote ethical conduct and an ethical culture.		✓	✓			
5	Act in an ethical manner at all times in the performance of duties and comply with ethical obligations in accordance with any relevant code or policy regarding conduct and behaviour.	✓	✓	✓	✓	✓	✓
6	Adopt and models constructive behaviours and approaches to work which promote ethical behaviours in Council employees.	✓	✓	✓		✓	
Fraud prevention							
1	Provide adequate security, including the provision of secure facilities for storage of assets, to assist in the prevention of Fraud, Corruption, Misconduct and Maladministration.		✓	✓			
2	Develop procedures to deter fraudulent or corrupt activity from occurring.	✓	✓	✓	✓		

Responsibility		Council Members	Chief Executive Officer	Managers	Employees	Audit and Risk Committees	Other (e.g., certain contractors and volunteers)
3	Where relevant, comply with the <i>Public Interest Disclosure Act 2019</i> .	✓	✓	✓	✓	✓	✓
4	Ensure appropriate internal controls are in place and operating effectively to minimise the risks of incidents.	✓	✓	✓		✓	
5	Ensure effective screening (e.g., criminal history) of employees, prospective employees, volunteers (as relevant) and contractors is undertaken, including by use of appropriate and effective contractual arrangements.		✓	✓			
6	Ensure all powers and authorities are appropriately delegated in order to minimise the risk of Fraud, Corruption, Misconduct or Maladministration.	✓	✓	✓			
Detection and investigation							
1	Ensure that where appropriate, proper investigations are conducted into allegations of Fraud, Corruption, Misconduct or Maladministration.	✓	✓				
2	Facilitate cooperation with any investigations undertaken by an external authority.		✓				

Responsibility		Council Members	Chief Executive Officer	Managers	Employees	Audit and Risk Committees	Other (e.g., certain contractors and volunteers)
3	Undertakes risk assessments on a regular basis.	✓	✓			✓	
4	Provides mechanisms for receiving allegations of Fraud, Corruption, Misconduct and Maladministration.	✓	✓				
5	Investigates matters of Fraud, Corruption, Misconduct and Maladministration.	✓	✓				
6	Cooperate as required with any investigations undertaken whether internally or by an external authority.	✓	✓	✓	✓		✓
Monitoring and reporting							
1	Report all instances of conduct known or reasonably suspected to be Fraud, Corruption, Maladministration or Misconduct in accordance with Council's policies.	✓	✓	✓	✓	✓	✓ (report to Responsible Officer)
2	Develop mechanisms for receiving allegations of Fraud, Corruption, Misconduct or Maladministration including appointing a responsible officer.	✓	✓				

Responsibility		Council Members	Chief Executive Officer	Managers	Employees	Audit and Risk Committees	Other (e.g., certain contractors and volunteers)
3	Work jointly with other areas of Council to co-ordinate activities relating to the control, prevention, detection and management of Fraud, Corruption, Misconduct or Maladministration.	✓	✓	✓		✓	
4	Review the effectiveness of the implemented policies that ensure risks are identified and that controls implemented by management are adequate.	✓	✓			✓	