

Fraud and Corruption Prevention Policy

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1. POLICY OBJECTIVE

This *Fraud & Corruption Prevention* policy outlines Council's commitment to the prevention and detection of fraud, corruption and misappropriation, and aims to:

- protect public funds and assets against fraud and/or corruption by the development, implementation and regular review of fraud and corruption prevention and detection controls
- educate staff and set high standards of professional and ethical conduct, particularly with respect to proper and transparent expenditure, and decision-making and management of public funds and assets
- foster an environment within which Council officers undertake active financial management and monitoring, and fraud and corruption control and reporting are established as a responsibility of all, in line with the organisational REACH values

Policy Statement

Council will not tolerate fraud or corruption in any form and is committed to:

- minimising losses by developing and implementing a fraud and corruption control plan
- raising staff awareness about fraud and corruption
- preventing fraud and corruption in the workplace
- creating an environment where concerns can be raised in a timely, safe and confidential manner
- detecting and investigating cases of fraud and/or corruption
- adopting appropriate investigation procedures, and providing support or representation for persons involved in investigation of any fraud or corruption allegations
- referring cases of suspected fraud or corruption to relevant authorities (immediately, or following initial investigation, depending on the allegations and/or available information)
- applying appropriate disciplinary procedures where fraud or corruption is proven
- taking appropriate action to recover any losses arising from fraudulent or corrupt activity

In any instances of fraud or corruption reported to an Officer of GDCC, Council commits to:

- thorough, fair and reasonable investigation of the reported circumstances
- appropriate referral to outside authorities, as warranted, or required by legislation
- affording protection to anyone reporting a matter (as per the Public Interest Disclosure or PID act, and/or in providing the expected level of confidentiality and privacy, subject to the requirements of investigation)
- the presumption of innocence for anyone accused of alleged fraudulence or corruption
- reasonable support and care for everyone involved in any allegations of fraud or corruption

2. BACKGROUND

The Victorian Local Government sector is rightly scrutinised for the efficient and effective management of public funds and assets with a strong emphasis on the prevention of fraud and/or corruption.

Fraud and/or corruption can adversely impact a Council's ability to meet its legislative obligations and achieve its objectives. It can damage its public image and reputation and adversely impact on service delivery and financial stability.

The *Local Government Act 2020* ("**LG Act**") also mandates that Councils must have adequate internal control systems. An adequate fraud and corruption control framework is a critical element to such a system, to minimise opportunities for fraud or corruption and to respond to inappropriate actions.

Greater Dandenong City Council is also subject to the Public Interest Disclosures Act 2012 ("**PID Act**"). This legislation encourages whistle-blowers ("**disclosers**") in coming forward and make public interest disclosures ("**PIDs**") relating to improper conduct (including fraudulent and corrupt conduct) within or by the Council, Councillors, employees and community members.

The PID Act protects disclosers and people connected with PIDs from suffering detrimental action in reprisal for making a disclosure or cooperating with the investigation of a PID.

Penalties for breaching the prohibitions contained in the PID Act are serious enough to attract 6-12 months' imprisonment and significant financial payments.¹

Perpetrators found to have committed fraudulent or corrupt activities will be subject to Council's disciplinary procedures and may also be prosecuted under the *Crimes Act 1958* (Vic).

3. SCOPE

This policy applies to everyone who directly or indirectly has an interest in the Greater Dandenong City Council (GDCC), as Councillors and employees, volunteers and contractors.

All Councillors and GDCC employees are required to act honestly and with integrity and to safeguard the public resources for which they are responsible, at all times.

This policy is to be read in conjunction with the *Fraud & Corruption Control Plan*, and supports and complements other Council policies and practices, as listed (but not limited to those) under *REFERENCES AND RELATED DOCUMENTS*, below.

4. DEFINITIONS

Unless otherwise specified within this policy, the following words and phrases are defined to mean the following, for this policy. Note that the definitions of **Corrupt conduct**, **Fraud** and **Improper Conduct** are not necessarily limited by the following definitions, and may be subject to interpretation against specific circumstances, acts, or changes to legislation (including, but not limited to, the *Crimes Act 1958* (Vic)).

Corruption includes dishonest or improper use of a position on the part of any Employee, Councillor or former Employee or Councillor.²

For the purpose of the *PID Act* and the *Independent Broad-based Anti-Corruption Commission Act 2011* ("**IBAC Act**") - to which the organisation and all Employees and Councillors must comply - "**Corrupt conduct**" means conduct:

¹ For more information about how the Council complies with the PID Act, see its Public Interest Disclosures Procedures, as established under s 58 of the PID Act

² Section 4, IBAC Act

- (a) *of any person that adversely affects the honest performance by a public officer or public body of his or her or its functions as a public officer or public body; or*
- (b) *of a public officer or public body that constitutes or involves the dishonest performance of his or her or its functions as a public officer or public body; or*
- (c) *of a public officer or public body that constitutes or involves knowingly or recklessly breaching public trust; or*
- (d) *of a public officer or a public body that involves the misuse of information or material acquired in the course of the performance of his or her or its functions as a public officer or public body, whether or not for the benefit of the public officer or public body or any other person; or*
- (da) *of a person (the first person) intended to adversely affect the effective performance or exercise by a public officer or public body of the functions or powers of the public officer or public body and result in the first person or an associate of the first person obtaining-*
 - (i) *a license, permit, approval, authority or other entitlement under any Act or subordinate instrument; or*
 - (ii) *an appointment to a statutory office or as a member of the board of any public body under any Act or subordinate instrument; or*
 - (iii) *a financial benefit or real or personal property; or*
 - (iv) *any other direct or indirect monetary or proprietary gain - that they would not have otherwise obtained; or*
 - (e) *that could constitute a conspiracy or an attempt to engage in any conduct referred to in paragraph (a), (b), (c), (d) or (da) - being conduct that would constitute a relevant offence.*

Councillors: a person who holds the office of member of a Council, under the requirements of the LG Act.

Council Funds: Cash, cheques, electronic funds transfers, vouchers or other negotiable instruments that belong to the Greater Dandenong City Council, or for which the Council has responsibility.

Council Property: Tangible or intangible assets owned by the Greater Dandenong City Council.

Employee: Includes Council employees (whether full-time, permanent part-time, temporary, casual and those on secondment), Contractors, Volunteers, or the employees of anyone providing services to or on behalf of Council.

Fraud: is characterised by dishonest conduct, which may include misuse of position or authority to obtain unjust advantage, the theft of funds, assets, intellectual property or other information, or the unauthorised use of Council assets for personal gain.

IBAC: the Independent Broad-Based Anti-Corruption Commission

Improper conduct: defined by the PID Act as including corrupt conduct as defined in s4 of the IBAC Act ³, or any of the following ⁴:

- (b) *conduct of a public officer or public body engaged in by the public officer or public body in their capacity as a public officer or a public body that constitutes -*
 - (i) *a criminal offence; or*
 - (ii) *serious professional misconduct; or*
 - (iii) *dishonest performance of public functions; or*
 - (iv) *an intentional or reckless breach of public trust; or*

³ Section 4(a), PID Act

⁴ Section 4, PID Act

(v) an intentional or reckless misuse of information or material acquired in the course of the performance of the functions of the public officer or public body; or

(vi) a substantial mismanagement of public resources; or

(vii) a substantial risk to the health or safety of one or more persons; or

(viii) a substantial risk to the environment; or

(c) conduct of any person that -

(i) adversely affects the honest performance by a public officer or public body of their functions as a public officer or public body; or

(ii) is intended to adversely affect the effective performance or exercise by a public officer or public body of the functions or powers of the public officer or public body and results in the person, or an associate of the person, obtaining -

(A) a licence, permit, approval, authority or other entitlement under any Act or subordinate instrument; or

(B) an appointment to a statutory office or as a member of the board of any public body under any Act or subordinate instrument; or

(C) a financial benefit or real or personal property; or

(D) any other direct or indirect monetary or proprietary gain - that the person or associate would not have otherwise obtained; or

(d) conduct of any person that could constitute a conspiracy or attempt to engage in any of the conduct referred to in paragraph (a), (b) or (c).

(NB: proprietary gain used in this context means exclusive or private gain)

LGI: Local Government Inspectorate

Prevention: the process by which the Greater Dandenong City Council, through Councillors, management team, employees, volunteers, and providers manage risks to prevent fraud and corruption, and includes:

- adoption of appropriate internal controls in response to fraud and corruption risk assessment, and embedding preventative measures and performance standards in relevant Council policies, procedures, and activities (such as procurement, recruitment, and governance and finance systems, practices, reporting and information)
- adherence to the Councillor and Staff Codes of Conduct - committing to ethical practices, organisational values, and disciplinary standards
- a commitment to imposing appropriate sanctions where applicable (e.g., disciplinary action and/or forwarding evidence and/or information to other agencies) to act as deterrence
- a transparent (confidential and protected) and easy system for reporting allegations
- publicising the outcomes of investigations where allegations of fraud or corruption are found to have substance, as a further deterrent
- raising awareness of Council's processes for preventing and responding to fraud and corruption, including compliance with legislative obligations, such as the PID and IBAC Acts
- providing information through the public website and the organisational intranet, including this policy (and others), and how officers and members of the public can report suspected fraud or corruption.

Record: any and all information created, sent, and received by a Council employee whilst carrying out the business of Council, including electronic documents, emails, website content, audio-visual records, databases and system-generated records, as well as physical documents and files.

5. POLICY

In accordance with the *Staff and Councillors Codes of Conduct*, all Councillors and Employees are responsible for acting with propriety and integrity in undertaking their duties.

Councillors and Employees must not use their position with the Council to gain personal advantage or to confer advantage, or disadvantage on any other person or organisation.

When a Councillor or Employee detects or is made aware of possibly fraudulent or corrupt activity, they have an obligation to report this. Internal and external mechanisms for reporting suspected fraud or corruption are provided in the *Fraud & Corruption Prevention and Control Plan*, available to staff on The Source: [Fraud and Corruption Prevention and Control Policy | Greater Dandenong Council](#) internally or externally.

Roles and responsibilities of officers under the PID Act are outlined in the Public Interest Disclosures Procedures (“**PID Procedures**”) available to staff on the PID Act information page on The Source: [Public Interest Disclosure Procedures | Greater Dandenong Council](#). This provides options for reporting PID matters internally or externally. (The *Fraud & Corruption Prevention and Control Plan* also provides a summary decision tree for determining if a matter is a reportable PID issue.)

All reports of alleged fraud or corruption will be treated in the strictest of confidentiality, and the identity of any discloser will be protected (until and if such details need to be provided to the Police or other authorised investigative authority). Records relating to any report of suspected fraud or corruption will be protected, and access granted only to appropriately authorised and relevant officers.

Council will establish and maintain a *Fraud & Corruption Prevention and Control Plan*, which includes an identification of areas of possible fraud and corruption, which are reflected in a “fraud risk register”, maintained on Council’s *Pulse* database.

6. RESPONSE TO THE OVERARCHING GOVERNANCE PRINCIPLES OF THE LOCAL GOVERNMENT ACT 2020

This Council *Fraud Policy* is compatible with and supports and upholds the overarching governance principles of Section 9 of the *Local Government Act 2020*, particularly, but not restricted to:

- (a) Council decisions are to be made and actions taken in accordance with the relevant law
- (g) the ongoing financial viability of the Council is to be ensured
- (i) the transparency of Council decisions, actions and information is to be ensured

Additionally, this Policy helps to ensure that the following supporting principles of the *Local Government Act 2020* are met:

- (b) the public transparency principles (section 58)
- (d) the financial management principles (section 101)

The processes outlined in this policy overtly provides for making the policy available to the public and provides access to reporting mechanisms. Stewardship of the policy and its associated actions is suitably delegated and resourced within the existing budget.

Associated procedures - including the management of documentation and identifying information - provide for both privacy and confidentiality (under the *Charter of Human Rights and Responsibilities*; see below), whilst broader transparency is also provided by GDCC being subject to internal and external audit and FOI access (as applicable).

Further transparency is ensured by having an external provider for whistle-blower situations, and providing direct contact details for independent, external bodies (IBAC, VO) that can call on Council to make information available.

Additionally, this policy commits Council to undertaking recovery processes in fraudulent scenarios, and serves as a deterrence for fraud and corruption. This helps ensure that GDCC uses its financial and other resources for serving the community.

7. CHARTER OF HUMAN RIGHTS AND RESPONSIBILITIES ACT 2006 – COMPATIBILITY STATEMENT

All matters relevant to the Victorian Charter of Human Rights and Responsibilities have been considered in the preparation of this policy and are consistent with the standards set by the Charter. The specific areas in the Victorian Charter of Human Rights and Responsibilities that relate to this policy are:

- Section 8 - Right to recognition and equality before the law
- Section 13 - Right to privacy and reputation
- Section 15 - Right to freedom of expression
- Section 18 - Right to have the opportunity to take part in public life and to vote
- Section 24 - Right to a fair hearing

8. RESPONSE TO THE GENDER EQUALITY ACT 2020

Council's Diversity, Access and Equity Policy and the *Gender Equality Act 2020* have been considered in the preparation of this policy but are not relevant to its contents.

The policy is purely administrative in its nature and does not have the potential to influence broader social norms and gender roles.

9. CONSIDERATION OF CLIMATE CHANGE AND SUSTAINABILITY

This policy has no obvious impact on Council's *Declaration on a Climate and Ecological Emergency* or *Climate Change Emergency Strategy 2020-2030* or the requirements of the *Local Government Act 2020* in relation to the overarching governance principle on climate change and sustainability; this policy is purely administrative in nature without potential to influence climate change adaptation, sustainability initiatives, or emissions reduction.

10. RESPONSIBILITIES

Audit and Risk Committee

The Audit and Risk Committee is responsible for monitoring the effectiveness of adopted policies and practices intended to reduce the risk of fraud and/or corruption.

If a fraud or corruption incident has occurred, the Audit and Risk Committee will be notified by a Senior Officer of Council (currently the *Executive Director Corporate Development* and/or the *Manager Governance, Legal & Risk*), consistent with Council's obligations of confidentiality for receiving and handling PIDs or other such reports.

Chief Executive Officer

When advised of any alleged fraud or corruption, the CEO will consider the nature and individual

circumstances (including formal advice or reports from investigators) and determine whether a matter will be dealt with under Council policies, e.g., *Performance and Behavioural Issues Policy*, or be referred directly to the appropriate authority, e.g., Victoria Police, the Local Government Inspectorate or IBAC.

Accordingly, the CEO will, and consistent with Council's obligations of confidentiality under the PID Act, if appropriate:

1. Inform the Mayor, Councillors and/or the Victorian Auditor General's Officer of the incident
2. Provide anonymised information at the next Audit & Risk Committee meeting of the actions undertaken to investigate the matter and any outcomes of the investigation
3. If the Executive Director Corporate Development (or Manager Governance, Legal & Risk), is suspected of fraud or corruption, assume responsibility for the investigation
4. As a "Principal Officer", the CEO must notify IBAC of any current or past matter they reasonably suspect involves corrupt conduct

For more information and resources for mandatory reporting obligations, see [Mandatory notifications | IBAC](#)⁵

Executive Director Corporate Development (or Manager Governance, Legal & Risk)

The Executive Director (or Manager) is responsible for the update of the fraud risk assessment/register.

When advised of any alleged fraud or corruption, the Executive Director (or Manager) will:

- consider whether any of the Council's obligations under the PID Act are triggered and act immediately to comply with them if so, including proactively securing the welfare of all persons connected with a PID and who are entitled to protections under the PID Act
- in consultation with the relevant Executive Director and the Manager Governance, Legal & Risk, engage a suitable investigator, either internal or external to Council
- as the responsible officer upholding this Policy, the officer is authorised to make decisions about the nature of the investigation and ultimately the recommendation for any resulting penalty
- if the CEO is suspected of fraud or corruption the investigation will be managed by the Executive Director Corporate Development (or Manager) in consultation with the Mayor (and, if required, the Chair of the Audit & Risk Committee)
- If the Mayor or Councillors are suspected of Fraud or Corruption, this will be managed by the Executive Director Corporate Development (or Manager) in consultation with the CEO (and, if required, the Chair of the Audit & Risk Committee) and under direction of any investigating entity pursuant to the PID Act if an assessable disclosure is involved
- Except as otherwise provided in this policy, the Executive Director Corporate Development (or Manager) will determine how and by whom the investigation will be conducted and whether the Police or other external assistance is required.

This decision will be made considering the nature and scale of the fraud or corruption being investigated. This is to ensure an appropriate level of investigation and resulting actions.

Executive Directors

⁵ Link correct as of 9th May 2023. The IBAC website should be checked for up-to-date information, as required

When advised of any alleged or suspected fraud or corruption - or if the Executive Director themselves suspects or detects fraud or corruption - has occurred, the Executive Director will consider if they are required to act in accordance with the PID Act.

If so, and this is consistent with their obligations under the PID Act, they will also immediately notify the Executive Director Corporate Development (or Manager) who will inform the Chief Executive Officer.

The Executive Director will *not* investigate the suspected fraud/corruption, nor discuss the matter with anyone except:

- the Chief Executive Officer
- Executive Director Corporate Development (or Manager)
- Manager Governance, Legal & Risk
- any investigator appointed by Council or IBAC (if involved).

Manager People & Change

Responsible for personnel issues arising from an investigation in accordance with the provisions of Council's *Staff Code of Conduct, Performance and Behavioural Issues Policy*, or other applicable OD Policies and Guidelines: [OD Policies and Guidelines | The Source \(greaterdandenong.vic.gov.au\)](https://www.greaterdandenong.vic.gov.au/od-policies-and-guidelines). This includes:

- facilitating disciplinary hearings
- appointing an investigator appropriate to the circumstances of the fraud or corruption
- ensure the appropriate management of the welfare of persons connected to a PID, including:
 - affording to those persons the protections they are entitled to under the PID Act, and
 - proactively protecting them against the risk of detrimental actions being taken in reprisal for coming forward or cooperating with the investigation of a PID
- providing information about the investigation process to employees if they are required to participate. This may include witnesses and any other persons relevant to the matter.
- arranging for support and/or representation for employees being subject to - or participating in - an investigation.

< a support person could be: a colleague, friend, or relative, or a Union, Appropriate Workplace Behaviour (AWB) Contact, or Occupational Health and Safety (HSR) representative >

Manager Governance, Legal & Risk

(As above, as per Executive Director Corporate Development, in the absence of that role.)

On the instruction of Executive Director Corporate Development or CEO, is responsible for investigating and reporting back on any irregular transactions or misuse of IT services and equipment brought to this Manager's attention.

Co-ordinating access to IT records, services and equipment for other matters that require investigation, whether facilitated by an in-house or external investigator.

Ensuring the security of any soft-copy records created or extracted due to any investigation, to meet Council's obligations under the PID Act to keep all records confidential and secured against unauthorised access or use and having the means to audit access and use of those records.

Managers

Managers are responsible for the coordination, monitoring, ongoing review and communication of this Policy and actions arising from the *Fraud & Corruption Prevention and Control Plan* and other relevant Council policies, procedures, and systems.

Managers are integral to leading a culture of honesty and integrity for the provision of services to the community and in the conduct of Council operations, consistent with the REACH values.

Managers are responsible for exercising due diligence and control to prevent, detect and report acts of fraud or corruption. Managers must set an example by consistently following established procedures and processes, identifying and implementing any controls for their management area(s), and advising employees of the acceptability or otherwise of their conduct, as required.

Under the PID Act, Managers and supervisors have specific roles to play if they receive a PID notification/allegation from - or a PID notification relating to - anyone whom they manage or supervise. They may also become involved in the welfare management of persons connected to PIDs. Managers at all levels are required to be familiar with their obligations under the PID Act (see [Public Interest Disclosure Procedures | Greater Dandenong Council](#) for more information).

Upon notification of suspected fraud or corruption (or if a Manager has reason to suspect that fraud or corruption exists) the Manager will

- consider if they are required to act in accordance with the PID Act, *and*
- if consistent with their obligations under the PID Act, also immediately notify:
 - their Executive Director, or
 - if the allegation involves that person - the Executive Director Corporate Development (or Manager Governance, Legal & Risk) or
 - if the Chief Executive Officer, the Mayor or a Councillor is alleged to be involved in the fraud or corruption - the matter shall be referred to the Executive Director Corporate Development (or Manager Governance, Legal & Risk)
 - the Executive Director Corporate Development (or Manager Governance, Legal & Risk) will decide if the matter is to be escalated to either the LGI or IBAC.
- will *not* investigate the suspected fraud or corruption, nor discuss the matter with anyone other than the Executive Director and/or the appointed investigator, a municipal or IBAC inspector, or Police.
- the Manager may also have obligations to ensure the appropriate management of the welfare of persons connected to a PID, including:
 - affording to those persons the protections they are entitled to under the PID Act, and
 - proactively protecting them against the risk of detrimental actions being taken in reprisal for coming forward or cooperating with the investigation of a PID
- Managers will ensure that all staff are encouraged to attend available Fraud and PID training

Risk Management Consultant

- Responsible for the review and update of the policy and strategy and recommending changes to current risk control measures
- Responsible for implementing appropriate risk financing for preventative fraud- or corruption-related activity and insurance (Commercial Crime policy) arrangements for fraudulent activity
- Responsible for appointing a suitable investigator; in the absence of the Manager Governance, Legal & Risk (or delegate this task to another suitable officer, e.g., Risk Management Consultant)

- Provide for the proactive management of the welfare of disclosers and people co-operating with any investigation of a PID, as required. (Refer to Council's *Public Interest Disclosures Procedures*.)

All other Employees

Employees are responsible for safeguarding Council assets against theft, misuse or improper use. Employees are required and encouraged to report any reasonable suspicions of fraud or corruption, consistent with the requirements of the PID Act, and Council's *Public Interest Disclosures Procedures*.

Suspicions or actual knowledge of fraud or corruption must be reported to:

- the Executive Director Corporate Development (or Manager Governance, Legal & Risk) - particularly if the allegation involves Chief Executive Officer, the Mayor or a Councillor; *or*
- to the Chief Executive Officer (if the allegation involves that Executive Director/Manager)

As above, the Executive Director/Manager (or CEO) will decide if the matter is to be escalated to either the Local Government Inspectorate or Independent Broad-Based Commission Against Corruption.

The employee will *not* attempt to investigate the suspected fraud and/or corruption, nor discuss the matter with anyone other than their Manager or the Executive Director (depending on whom may be involved in the alleged fraud or corruption), a Council-appointed investigator, municipal inspector, IBAC investigator or the Police.

All matters regarding the suspected fraud and/or corruption *must* be treated confidentially. Staff seeking to disclose suspected fraud or corruption can avail themselves of the protections of the PID Act. Protection from detrimental action taken in reprisal for making a report or cooperating with an investigation also exists.

All employees must participate in and give full cooperation to audits and investigations, if called upon to do so, including providing testimony or evidence of processes, procedures or specific transactions, decisions, conversations or similar.

Importantly, strict confidentiality obligations apply to all records and information connected with PIDs / suspected fraud or corruption matters, and all employees and Councillors are advised to become familiar with those obligations as set out in the PID Procedures. (Training will also cover these elements.)

Audit Functions

Internal Audit

Internal Audit is not involved in day-to-day checking and assurance but is an independent and objective review activity. Internal Audit also assesses whether there is adequate compliance with applicable legislative requirements, and GDCC's own policies and procedures, including, but not limited to those listed below.

The Internal Auditor will also undertake periodic checks of the effectiveness of Council's policies, systems and procedures as they relate to fraud and corruption prevention. The role of Internal Audit is to assist Council with a methodical review process for the fraud and corruption control environment, and to identify any gaps, failure of controls, or areas for improvement.

External Audit

External Audit is conducted to verify GDCC's annual financial reporting. External Audit also has a role in fraud prevention by reviewing Council policies, systems and procedures against established financial reporting and auditing requirements and accounting standards.

External audit will be - in most circumstances - undertaken by the Victorian Auditors General Office or its appointed agents, and, at times, the Local Government Inspectorate.

11. REPORTING, MONITORING AND REVIEW

The *Fraud & Corruption Prevention Policy* is formally reviewed every three years, as a minimum. In the interim, changes to the legislative framework, or relevant associated developments (eg VO or IBAC bulletins, cases or briefings, etc) will be reviewed to determine if changes to this policy (and the associated *Fraud & Corruption Control Plan*) are necessary.

Responsibility for any review lies with the Manager Governance, Legal & Risk.

The responsibilities outlined in this Policy are communicated through quarterly training, provided by Council's whistle-blower service provider, **Grant Thornton Australia**, and support information will be distributed on GDCC's intranet, also quarterly.

Additionally, the practical implementation of the commitments made in this Policy are outlined in the *Fraud & Corruption Control Plan*, with actions and timeframes specified in that document.

The Public Disclosure framework (including this Policy) is also regularly reviewed by the Internal Auditor.

12. REFERENCES AND RELATED DOCUMENTS

Legislation

- *Crimes Act 1958 (Victoria)*
- *Fair Work Act 2009 (Cwlth)*
- *Financial Management Act 1994*
- *Independent Broad-Based Anti-Corruption Commission Act 2011*
- *Local Government Act 2020*
- *Privacy Act 1988 (Cwlth)*
- *Public Interest Disclosures Act 2012*
- *Public Records Act 1973*

Related Council and Other Policies, Procedures, Strategies, Protocols, Guidelines

- *Australian Standard for Fraud and Corruption Control AS8001-2021*
- *Commercial Crime insurance policy*
- Greater Dandenong City Council:
 - *Appropriate Workplace Behaviours Policy*
 - *Council Expenses, Support and Accountability Policy*
 - *Councillors Code of Conduct and Staff Code of Conduct*
 - *Councillor Gift Policy*
 - *Councillor Media Policy, Media Policy, and Social Media Policy*
 - *Delegations Register*
 - *Enterprise Agreement*
 - *Financial Management Policy*
 - *Fraud & Corruption Prevention and Control Plan*
 - *Fraud and Corruption Response Procedures*

- *Gifts, Benefits and Hospitality Policy*
- *Induction and On-Boarding procedures*
- *Information Security Policy*
- *Mobile Device Policy*
- *Motor Vehicle Management Code of Practice*
- *Performance and Behavioural Issues Policy*
- *Police Check Policy*
- *Privacy and Personal Information Policy*
- *Procurement Policy*
- *Public Interest Disclosure Policy*
- *Public Interest Disclosure Procedures*
- *Purchasing Card Policy*
- *Records Management procedures*
- *Recruitment Policy*
- *Register of Interests and Conflict of Interest procedures and forms*
- *Risk Management Policy*
- *Public Records Office Guidance Procedure (PROS-07/01) (2021)*