



Fraud and corruption prevention framework

Version information

Owner	Date and source of approval	Version/OLARIS #	Description / Changes	Date for next review
Office of the Clerk	Clerk, April 2023	V1.1 23-002622	Changes to reflect the amendments to the PID Act, revised public sector code of conduct, audit and risk committee role, controls related to procurement and conflicts of interest.	2025
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1. Policy statement

- 1.1. The *Integrity Commission Act 2018* (the Integrity Commission Act) establishes an independent statutory body to investigate and report on complaints about corrupt conduct, including fraudulent conduct, in the public sector.
- 1.2. While the Integrity Commission plays a critical role in addressing corruption in the ACT, this does not mean that individual public sector agencies can relax their efforts to effectively manage fraud and corruption risks.
- 1.3. The Office does not tolerate fraudulent or corrupt behaviour and will continue to develop and implement appropriate internal controls and risk management arrangements to reduce both the likelihood and consequences of such conduct.
- 1.4. Suspected instances of fraud and corruption will be dealt with in accordance with relevant legislative requirements and may be referred to the ACT Integrity Commission, qualified investigators appointed by the Clerk, the Public Sector Standards Commissioner, or the Australian Federal Police.
- 1.5. The Office will pursue disciplinary action and/or criminal prosecution wherever it is appropriate to do so.
- 1.6. All Office staff, including contractors, are required to ensure that fraud and corruption prevention strategies are followed, and to report any suspicions—reasonably formed—that such conduct has occurred or is occurring.
- 1.7. Staff and contractors of the Office can assist in maintaining integrity of the Office by actively modelling and upholding honesty in all their dealings¹—and by assisting in the development and maintenance of a strong ethical culture more generally.
- 1.8. This framework sets out the arrangements that the Office has adopted to guard against fraud and corruption. It is available on the Office’s intranet site and will be reviewed every two years.

¹ See the [Public Sector Management \(ACT Public Sector\) Code of Conduct 2022](#) and the [Public Sector Management \(Office of the Legislative Assembly\) Code of Conduct 2018](#).

- 1.9. I encourage everyone to read through the framework, to understand their obligations, and to be resolute in assisting the Office to prevent and detect corrupt or fraudulent conduct.

Tom Duncan

Clerk

February 2025

2. Purpose

- 2.1. The Office's Fraud and Corruption Prevention Framework has been developed to raise awareness of fraud and corruption matters within the organisation and to provide guidance to staff and contractors about the prevention, detection and reporting of suspected fraud and corruption.
- 2.2. It is directed towards preventing fraudulent and corrupt activity and ensuring that where fraud or corruption does occur, it is detected promptly, investigated thoroughly, and that appropriate action is taken in each case.

3. Definition of terms

What is fraud?

- 3.1. Fraud is defined as 'a dishonest and deliberate course of action which results in the obtaining of money, property or an advantage to which the recipient would not normally be entitled'.² All fraud that is perpetrated in the course of, or incidental to, a person's official roles, duties or functions within the Assembly or in the Office would fall within the statutory meaning of 'corrupt conduct' under the Integrity Commission Act.
- 3.2. Part 3.3 of the *Criminal Code 2002* also provides for a number of criminal offences in relation to fraud including:
 - obtaining property by deception;
 - general dishonesty;
 - conspiracy to defraud; and
 - obtaining financial advantage from the Territory.
- 3.3. Fraudulent conduct may include:
 - theft of money or assets owned by the Territory;
 - using Territory owned equipment for personal benefit;
 - misusing/leaking information for personal benefit;
 - manipulation of, or unauthorised access to, IT databases for personal gain;
 - false claims for petty cash;

² Grabosky, Peter N. '[Controlling Fraud, Waste, and Abuse in the Public Sector](#)' Australian Institute of Criminology, p 9.

- payment of travel and other allowances without entitlement or in excess of entitlement;
- selection of suppliers or consultants other than by merit;
- misuse of credit card/Cabcharge;
- false claims for payments/payroll transactions;
- false claims for promotion or recruitment;
- receipt of salary or entitlements to which a person is not entitled; or
- theft of revenue.

What is corruption?

3.4. With the passage of the Integrity Commission Act, there is now an expansive statutory definition of corrupt conduct (which includes fraudulent conduct) applying within the ACT public sector. Section 9 of the Act states that corrupt conduct is conduct:

(a) that could—

- (i) constitute a criminal offence; or
- (ii) constitute a serious disciplinary offence; or
- (iii) constitute reasonable grounds for dismissing, dispensing with the services of, or otherwise terminating the services of, a public official; and

(b) that is any of the following:

- (i) conduct by a public official that constitutes the exercise of the public official's functions as a public official in a way that is not honest or is not impartial;
- (ii) conduct by a public official or former public official that—
 - (A) constitutes a breach of public trust; or
 - (B) constitutes the misuse of information or material acquired by the official in the course of performing their official functions, whether or not the misuse is for the benefit of the official or another person;
- (iii) conduct that adversely affects, either directly or indirectly the honest or impartial exercise of functions by a public official or a public sector entity;
- (iv) conduct that—
 - (A) adversely affects, either directly or indirectly the exercise of official functions by a public official or public sector entity; and

(B) would constitute, if proved, an offence against a provision of the Criminal Code, chapter 3 (Theft, fraud, bribery and related offences);³

(v) conduct that involves any of the following:

(A) collusive tendering;

(B) fraud in relation to applications for licences, permits or other authorities under legislation designed to protect health and safety, protect the environment or facilitate the management and commercial exploitation of resources;

(C) dishonestly obtaining or assisting in obtaining, or dishonestly benefiting from, the payment or application of public funds for private advantage or the disposition of public assets for private advantage;

(D) defrauding the public revenue;

(E) fraudulently obtaining or retaining employment or appointment as a public official;

(vi) conduct engaged in by a person in relation to conduct mentioned in subparagraphs (i) to (iv) (the primary conduct), that would constitute an offence against the Criminal Code, part 2.4 (Extensions of criminal responsibility) on the basis that the primary conduct is an offence, whether or not the primary conduct is in fact an offence.

What is serious or systemic corrupt conduct?

3.5. Under the Integrity Commission Act, serious corrupt conduct means corrupt conduct that is likely to threaten public confidence in the integrity of government or public administration.⁴

3.6. Systemic corrupt conduct means instances of corruption that reveal a pattern of corrupt conduct in one or more public sector entities.⁵

Integrity Commission resources

3.7. The following factsheets and information resources are available from the ACT Integrity Commission website:

- [ACT Integrity Commission pamphlet](#)
- [Factsheet: Reports to the Commission](#)
- [Factsheet: Protections for reporters](#)

³ For example, Part 3.2 of the *Criminal Code 2002* provides for a number of criminal offences relating to bribery, corrupting benefits, payola, and abuse of public office, which would fall under the general rubric of corruption.

⁴ Section 10 of the Integrity Commission Act.

⁵ Section 11 of the Integrity Commission Act.

- [Factsheet: Public Interest Disclosures](#)
- [Factsheet: Corruption and its harms](#)
- [Factsheet: Glossary of integrity terminology](#)
- [Factsheet: What is corruption and why is it important?](#)
- [Factsheet: Corruption risks](#)
- [Factsheet: Examination Summons](#)

4. Roles and responsibilities

- 4.1. All staff have an ongoing responsibility to ensure the efficient and effective use of public monies and assets. Specific responsibilities for fraud control and corruption within the Office are allocated to a range of separate roles in the Office as detailed below.

The Clerk

- 4.2. The Clerk has overall responsibility for the Office's fraud and corruption prevention arrangements.⁶

Executive Management Committee

- 4.3. The Office's Executive Management Committee (EMC) and its members are responsible for:
- adopting and promoting the highest standards of ethical behaviour within the Office;
 - insisting upon and implementing sound financial, legal and ethical decision making within the Office;
 - considering/endorsing the Office's code of conduct, fraud and corruption prevention framework, PID procedures, ICT policies, and any other policies and procedures that operate as important internal controls to guard against fraud or corruption for particular systems or business processes;
 - receiving (either collectively or as individual members of EMC) reports of suspected fraud or corruption; and
 - ensuring awareness of fraud and corruption arrangements are promoted to all staff.

⁶ Section 31 of the *Financial Management Act 1996*.

Managers and supervisors

4.4. Managers and supervisors are responsible for:

- modelling the Office's values, including honesty and integrity;
- developing and maintaining controls and procedures that guard against fraud or corruption;
- receiving reports about suspected fraud or corruption from staff under their supervision;
- ensuring awareness of fraud and corruption arrangements are promoted to their staff; and
- considering fraud risks in their areas of control and regularly assessing the potential for breaches of integrity, including in relation to fraud and corruption.

Audit and risk committee

4.5. The audit and risk committee is responsible for:

- reviewing the adequacy of risk management arrangements and associated procedures for effectively identifying and managing the Office's financial and business risks;
- reviewing the effectiveness of the Office's internal control framework, including over external parties such as contractors and advisors;
- reviewing the Office's key governance policies and procedures, including the Clerk's Financial Instructions for currency and completeness;
- satisfying itself that internal processes and procedures are operating effectively, and risk management is used to support decision making;
- consideration of new or emerging risks; and
- monitoring the Office's fraud and corruption arrangements, including its fraud and corruption prevention plan.

Senior Director, Office of the Clerk

4.6. The Senior Director, Office of the Clerk, is the Senior Executive Responsible for Business Integrity Risk (SERBIR) and is responsible for:

- acting as a contact point for allegations of fraud or corruption and advising the Clerk how particular allegations should be handled;
- ensuring the Office has a current fraud and corruption control framework and risk assessment and monitoring risk treatments;

- notifying the Office's audit and risk committee where revisions are made to the framework or risk assessment;
- maintaining an appropriate recording and tracking system to ensure that all instances of suspected fraud and corruption are recorded; and
- ensuring that staff are aware of and understand the framework.

Chief Finance Officer

4.7. The Office's CFO is responsible for:

- acting as a contact point for allegations of fraud or corruption and advising the Clerk how particular allegations should be handled;
- assisting the Senior Director, Office of the Clerk, in developing and maintaining the Office's fraud and corruption framework and assessing risks associated with fraud and corruption;
- educating staff about, and ensuring compliance with, the Clerk's Financial Instructions; and
- ensuring appropriate internal controls are in place to guard against fraud in relation to the Office's financial systems.

Manager, HR and Entitlements

4.8. The Manager, HR and Entitlements is responsible for:

- ensuring that the Office has an up-to-date code of conduct;
- ensuring that staff (including new staff) are aware of and understand the Office's code of conduct and the pub; and
- ensuring that new staff and contractors are provided with a copy of the Office's fraud and corruption prevention framework.

All staff

4.9. The Office's staff are responsible for:

- Understanding and complying with their obligations under s 9 of the PSM Act, including:
 - Avoiding and declaring conflicts of interest (s 9(1)(a)-(b))
 - Being diligent, impartial and honest (s 9(1)(c))
 - Not taking improper advantage of information gained through in their job (s 9(2)(b))

- Not unlawfully disclosing information (this includes the unlawful release of information that would be a contempt of the Assembly (e.g. release details of a draft committee report and may be a criminal offence in certain circumstances - see s 153(1) of the *Crimes Act 1900*—It is an offence for a Territory officer to disclose information that it is their duty not to disclose);
- Reporting any suspected fraudulent or corrupt activity within the Office (reports can be made to managers/supervisors or any member of the Executive Management Committee)
- Familiarising themselves with the fraud and corruption prevention framework, the Office's code of conduct, the Clerk's financial instructions, and other key governance documents that are directed towards ethical conduct, and
- Through their decisions and actions, contributing to a strong culture of integrity and honesty within the Office.

5. Planned approach

- 5.1. The Office's approach to fraud and corruption control is based on prevention, detection, investigation, and taking action.

Prevention

- 5.2. Developing and maintaining a culture of honesty and integrity is an important means by which the Office is able to prevent fraudulent or corrupt conduct.
- 5.3. Through its code of conduct, the Office promotes its values and sets out clear expectations around appropriate conduct. The Clerk, the EMC and managers are required to actively and visibly support anti-fraud and corruption measures and to promote a culture in which staff report suspected instances of fraud or corruption.
- 5.4. Managers should ensure that all business processes, particularly those assessed as having a higher predisposition to the risks of fraud and corruption, are subject to a rigorous system of internal controls that are well documented, updated regularly and understood by relevant staff. The Office's internal control environment contributes towards general deterrence and reduces the likelihood that fraudulent or corrupt conduct will remain undetected.
- 5.5. Some of the controls that the Office adopts to reduce the likelihood or impacts of fraud and corruption are set out below.

Risks	Examples of controls
• Poor governance, non-compliance with fraud and corruption legislation and requirements.	• Broad range of policies and procedures relating to ethical conduct, including Office's Fraud and Corruption Framework. • Fraud and corruption risk register and associated treatments. • Legislative compliance register. • Regular compliance and performance audits on behalf of the Office's Audit and Risk Committee. • External audit by the ACT Audit Office. • Oversight by the Office's executive management committee.
• Paying fraudulent invoices. • Fraudulent engagement of contractors. • Self-dealing, kickbacks/bribery. • Theft of portable and attractive items. • Fraudulent use of Cabcharge/credit card. • Theft of petty cash. • Fraudulent claims for travel and other entitlements (e.g. health and wellbeing allowance). • Payroll or entitlements fraud (paying fraudulent claims for pay or other entitlements).	• Clerk's financial instructions, procurement policy, code of conduct and risk management framework, and other governance documents. • Physical security policies, CCTV and access control. • Segregation of duties (i.e. ensuring that different staff perform different aspects of a financial processing task so that it would take more than one person to undermine the integrity of the system). • Standard operating procedures for approving payments. • Automated systems to reduce manual entry. • Background checking and security clearances for positions of trust.
• Poor communication about fraud and corruption obligations. •	• e-learning modules, training and information seminars. • Induction information. • Integrity Commission training.

Risks	Examples of controls
	• Single place for accessing all policies and procedures. • Newsletter articles and emails to all staff about fraud and corruption prevention arrangements.
• Misuse of official information for improper purposes.	• Procedures for handling in-camera evidence. • Assembly's contempt provisions. • Secured personnel files and limited staff access. • Access controls and audit trail associated with access to files stored in records and information system. • Information security policies. • Cybersecurity and independent assurances for ICT systems. • Background checking and security clearances for positions of trust.
• Unmanaged conflicts of interest.	• Conflict of interest declarations required as part of recruitment processes and procurement processes. • Gift reporting arrangements. • Annual conflict of interest declarations as part of annual performance and development arrangements.

Detection

- 5.6. Fraud can be detected by effective accounting and system controls and by recognising variations from standard practice or where anomalous transactions are identified.
- 5.7. Staff cooperation, observations and initiative are important in preventing and detecting fraud in the workplace. In particular, the Office's finance and HR staff are

well placed to detect fraud in these areas due to their detailed knowledge of work practices, the comparatively small number of transactions across the organisation, and the high level of visibility over expenditure and payroll variations.

- 5.8. Similarly, managers and supervisors have a high level of visibility in relation to committing to expenditure, verifying that goods and services have been received, entitlements claims, procurement processes, and selection processes.
- 5.9. Unexplained deviations from the norm may be an opportunity to further explore whether any fraudulent or corrupt conduct is at issue.

Indications of fraud

- 5.10. Managers, staff and contractors should be alert to the common signs of fraud. Signals for potential fraud, or of an environment where it could be committed, include:
 - implausible excuses and reasons for unusual events or actions;
 - senior staff involved in routine process work such as purchasing, ordering and receiving of goods;
 - staff evidently living beyond their means, who have access to funds, or control or influence over service providers;
 - excessive staff turnover;
 - staff who do not take holidays for extended periods;
 - potential conflicts of interest not declared;
 - excessive number of duties (e.g. both processing and approving the same transaction) residing with one person;
 - undue secrecy or excluding people from available information;
 - staff who treat controls and standard practice as challenges to be overcome or defied;
 - unauthorised changes to systems or work practices;
 - missing documentation relating to client or agency financial transactions;
 - “blind approval” where the person signing does not sight supporting documentation; and
 - presentation of a duplicate invoice for payment.

Financial reporting and data analysis

- 5.11. The Office undertakes monthly budget monitoring to track spending against budget and aims to identify any inconsistencies as soon as possible.
- 5.12. The ACT Audit Office also conducts an annual review of the Office's financial statements.

Internal and external audit

- 5.13. All areas of the Office are expected to comply with the Clerk's financial instructions and are subject to review by the Office's audit and risk committee.
- 5.14. The Office is also subject to external audits undertaken by the ACT Audit Office.

Investigation

- 5.15. The Office's arrangements for investigating allegations of fraud or corruption are outlined at section 7 below.

Taking action

- 5.16. The Office will take all appropriate disciplinary action against staff found to have engaged in fraudulent or corrupt conduct. Where criminal offences may have been committed, these will be investigated by the AFP and, where evidence indicates that an offence has been committed, referred for criminal prosecution. The Office will seek to recover any public funds that have been lost due to fraudulent or corrupt conduct.

6. Office's fraud and corruption risk assessment

- 6.1. The Office's fraud and corruption risk assessment process is used to identify fraud and corruption risks, to assess their likelihood and consequence, and to develop any additional treatments that might be required to bring risks to within acceptable levels of tolerance.
- 6.2. Key fraud risks include:
 - Risk of sham invoicing + contractors/suppliers overcharge for services / Fraudulent engagement of contractors
 - Self-dealing, kickbacks/bribery, unmanaged conflicts of interest in procurement activities
 - Theft of portable and attractive items

- Fraudulent use of Cabcharge/credit card
 - Theft of petty cash
 - Fraudulent claims for travel and other entitlements (e.g. health and wellbeing allowance)
 - Payroll and HR related fraud
 - Inadequate/unclear/poorly communicated governance and policy arrangements in relation to fraud and corruption
 - Misuse of official information for improper purposes
 - Unmanaged conflicts of interest
- 6.3. The Office's fraud and corruption related risks are reviewed annually by the Senior Director, Office of the Clerk, and the Chief Finance Officer, and are included in a standalone risk register stored in OLARIS.
- 6.4. Overall, the Office is assessed as having a low-risk of fraud or corruption, mainly due to:
- the small size of the organisation;
 - the low number of high-value transactions for which it is responsible, the high level of visibility over transactions by segregation of duties in relating to committing to expenditure and payment of accounts; and
 - the strength of existing controls that are in place to manage these kinds of risk.

7. Reporting corrupt or fraudulent conduct

- 7.1. Where the Clerk, a staff member or a contractor of the Office reasonably believes that fraudulent or corrupt conduct may have occurred, or may be occurring, they must report that conduct to the appropriate authority.
- 7.2. The appropriate authority will vary depending on the nature of the conduct at issue and the position that is held by the person who suspects that corrupt or fraudulent conduct has or is occurring.

Office staff

- 7.3. All staff of the Office are required as a matter of law to report corrupt or fraudulent conduct by a public servant or public sector member.⁷

⁷ See ss 9(4) and 151 of the *Public Sector Management Act 1994*

- 7.4. In the first instance, it is generally best to report any concerns or suspicions to an immediate supervisor or manager. Supervisors and managers should then discuss the matter with the Senior Director, Office of the Clerk, or the Chief Finance Officer who may seek additional information and raise the relevant matters with the Clerk. The Clerk may then seek additional advice from the ACT Government Solicitor, the Integrity Commission or the Professional Standards Unit (CMTEDD) about appropriate options for preliminary assessment, investigation, referral, reporting or other action.
- 7.5. If a staff member is unable to raise the issue with their supervisor or manager (for instance, where the supervisor or manager might themselves be suspected of involvement in fraudulent or corrupt conduct), they should raise the issue directly with a member of the EMC (Clerk, Deputy Clerk, Executive Manager, Senior Directors, or Chief Finance Officer).
- 7.6. Staff should report suspicions to only those people who absolutely need to know. This protects people from the circulation of allegations that are not proven and prevents the possible destruction of evidence.

Integrity Commissioner mandatory reporting requirements⁸

- 7.7. The Clerk and officers of the Senior Executive Service (SES) within the Office (the Deputy Clerk and Serjeant-at-Arms, and the Executive Manager of Business Support) must make a report to the Integrity Commission about **any matter** that they suspect, on reasonable grounds, involves serious or systemic corruption.
- 7.8. A failure to make a report as soon as practicable is an offence.
- 7.9. Although not mandated under the Act, staff of the Office are able to make a complaint to the Integrity Commission about conduct that may be corrupt conduct.⁹ For more information on an Integrity Commission report please visit the Integrity Commission website at <https://www.integrity.act.gov.au/>.

Public interest disclosures

- 7.10. Office staff and contractors should be aware that the *ACT Public Interest Disclosure Act 2012* (PID Act) makes provision for reporting of wrongdoing, including maladministration.

⁸ See Division 3.1.2 of the Integrity Commission Act.

⁹ See s 57 of the Integrity Commission Act. It is also open to the Integrity Commission to refer a corruption report to another entity, including to the Clerk of the Legislative Assembly, in relation to staff of the Office (See ss 70, 106, 107 of the Integrity Commission Act).

- 7.11. The Act provides for a method of investigating allegations, while protecting individuals who have made disclosures from any reprisals. Members of the public, as well as current and former members of the ACT public sector, may make a public interest disclosure.
- 7.12. The Office's disclosure officers are the:
- Clerk;
 - Deputy Clerk; and
 - Senior Director, Office of the Clerk.
- 7.13. The Office has developed detailed procedures for making a public interest disclosure, which are available on the Assembly website and intranet.

Mandatory reporting to the Chief Police Officer

- 7.14. Under the PID Act, where the Office is satisfied on reasonable grounds that a public interest disclosure involves, or could involve, an offence, it must refer the matter to the Chief Police Officer of the ACT.¹⁰

Reporting potential fraudulent or corrupt conduct by an MLA or staff member of an MLA

- 7.15. Where a staff member of the Office becomes aware of conduct that is possibly corrupt or fraudulent conduct on the part of an MLA or a staff member of an MLA, they have an obligation to report the matter directly to the Clerk of the Assembly.
- 7.16. Having reviewed the circumstances and available material, the Clerk will determine whether further internal inquiries are required and whether to refer the matter to the Integrity Commission, the Legislative Assembly Commissioner for Standards, or the Australian Federal Police for further investigation.

Investigating fraud and corruption

- 7.17. The investigation of fraud and corruption is governed by legislative and administrative requirements including the:
- Office of the Legislative Assembly Enterprise Agreement;
 - *Public Sector Management Act 1994*;
 - Public Sector Management Standards 2016;
 - *Public Interest Disclosure Act 2012*; and

¹⁰ See s 21 of the Public Interest Disclosure Act.

- *Integrity Commission Act 2018.*
- 7.18. The Clerk is responsible for deciding what further action is to be taken following a report of fraud or corruption, including in relation to the commencement of a preliminary inquiry/assessment, the initiation of a formal misconduct investigation, and compliance with mandatory reporting requirements (for example, to the Chief Police Officer or to the Integrity Commissioner). The Clerk may seek appropriate legal advice where necessary.
- 7.19. Where the Clerk determines that a preliminary assessment is to be undertaken, the appropriate manager/supervisor within the Office will undertake that assessment to determine whether the matter can be resolved or whether further action is required or not.¹¹ Where further action is required, the Clerk may appoint an external investigator, including from within the office of the Public Sector Standards Commissioner/Professional Standards Unit, to conduct an investigation.¹²
- 7.20. Investigators engaged by the Office to conduct an investigation will follow relevant standards for the conduct of inquiries and investigations that apply in the ACT public sector, ensuring that procedural fairness and natural justice principles are observed.
- 7.21. It is important to ensure that information relating to a matter is provided only on a need-to-know basis. Which persons have a legitimate need to have access to, or knowledge of, particular information will vary from case to case.
- 7.22. The Clerk may also refer matters to the Chief Police Officer, the ACT Integrity Commission, the Auditor-General, the Electoral Commissioner, or the Ombudsman in accordance with relevant statutory requirements.

Those suspected of committing fraud or corruption

- 7.23. Anyone suspected of committing fraud is considered to be innocent until proven guilty. Staff that are to be interviewed as part of a fraud or corruption investigation carried out at the initiative of the Office have the right to:
- expect that their affairs will not be disclosed to and discussed with people not concerned with the matter;
 - expect any interviews or investigations will adhere to the principles of procedural fairness;
 - expect that interviews or investigations are not seen as imputing guilt;

¹¹ See Office of the Legislative Assembly Enterprise Agreement.

¹² The Clerk can make a request of the Public Sector Standards Commissioner to investigate in accordance with ss 144(2) and 152 of the *Public Sector Management Act 1994* and the Office of the Legislative Assembly Enterprise Agreement.

- seek advice prior to the conduct of any interview;
- have a solicitor, union representative or other person present whilst being interviewed;
- have an interpreter present if necessary; and
- request access to documents relating to the investigation.

7.24. For further information about what to expect, refer to the *Guidelines to the Misconduct Process* prepared by the ACT Public Sector Standards Commissioner.¹³

8. Records and monitoring

Record of reports/matters

- 8.1. All reports of fraud or corruption are recorded in a reports and matters register. This register is updated regularly in OLARIS to reflect the actions and decisions taken with respect to any reports or matters that arise.
- 8.2. The Office will report on fraud and corruption matters in its annual report.

Monitoring the effectiveness on internal controls

- 8.3. Following the verification that fraudulent or corrupt conduct has occurred, the Office's EMC and audit and risk committee will be advised, and each will consider whether a review of internal controls is required to reduce the likelihood that similar conduct will occur in the future.
- 8.4. The Office will implement any improvement to internal controls as soon as possible.

Communication and awareness

- 8.5. The Office recognises that the primary purpose of education and internal communication in the area of fraud and corruption prevention is to raise the level of awareness amongst employees about what constitutes fraud or corruption and to clearly set out the procedures that the organisation has adopted to address suspected instances of fraudulent or corrupt activity.
- 8.6. The Office will maintain an ongoing fraud and corruption awareness raising program to ensure that staff understand their responsibilities in relation to fraud and

¹³ Available on the Commissioner's website: <https://www.cmtedd.act.gov.au/industrial-relations-and-public-sector-management/commissioner>

corruption prevention and are knowledgeable as to the relevant procedures and processes that have been instituted.

8.7. To this end, the Office will ensure that:

- all new employees receive information on the Office's fraud and corruption prevention policies (outlined in this plan) and code of conduct;
- staff complete the Office's online fraud and corruption training;
- staff are aware of reporting methods available;
- staff are encouraged to report any suspicion of fraud; and
- all updates and changes to fraud and corruption prevention policies, procedures, codes of conduct are circulated to all staff via the intranet, internal email and the Assembly newsletter.

8.8. The Office will also ensure that relevant policies and procedures are appropriately communicated and information about key areas of fraud and corruption prevention issued by the ACT Integrity Commission are distributed throughout the organization.

Review

8.9. The Office will review this document every two years. A review will entail:

- the conduct of a risk assessment and identification of strategies to address any weaknesses or gaps in internal controls;
- reviewing changes (if any) associated with the operations of the Office or the environment in which it conducts its business; and
- verifying that relevant recommendations contained in internal and external audit reports have been adequately addressed.

Enquiries and assistance

8.10. For further advice or assistance please contact Senior Director, Office of the Clerk or the Office's Chief Finance Officer.