

## 1. Policy intent

This policy defines and establishes commitment towards identifying and managing the risks of fraud and corruption within Tablelands Regional Council (Council) and its dealings with key stakeholders.

## 2. Scope

This policy applies to all Councillors, employees and volunteers engaged directly by Tablelands Regional Council as well as all agents and contractors either engaged by Council or by an authorised contractor of Council. The policy covers all circumstances when performing work, duties or functions for the Council, as well as related activities such as work-related functions, travel, conferences and any circumstances when a person is representing the Council. It applies to actual or suspected occurrence of fraud and corruption.

## 3. Principles

This policy is based on the following principles:

- 3.1 Demonstrate transparency and build integrity into every decision and action;
- 3.2 Develop and maintain evidence based risk registers;
- 3.3 Ensure impartiality of decision making, advice and review;
- 3.4 Provide clarity around responsibility and accountability, including disclosures, conflicts of interest and reporting; and
- 3.5 Support the approach through tailored education and training.

## 4. Definitions

**Fraud** is defined as the crime of “obtaining financial or other benefit by deception”. It is important to note there is a mental or fault element to fraud; it requires more than carelessness, accident or error.

**Corruption** has the same meaning as ‘corrupt conduct’ under the *Crime and Corruption Act 2001*.

**CCC** refers to the Crime and Corruption Commission Queensland.

## 5. Policy

- 5.1 Tablelands Regional Council has zero tolerance for fraud and corruption and is committed to acting in the best interests of the community and upholding the principles of honesty, integrity and transparency. It is totally unacceptable for any Councillor, employee, volunteer, contractor or other agent of Council to engage in, or participate in, fraudulent or corrupt conduct.
- 5.2 Council is committed to maintaining and continuously improving its governance requirements, which include fraud and corruption control, in accordance with established good governance and risk management principles. Council is committed to preventing, deterring, detecting and responding appropriately to alleged fraudulent and corrupt behaviour. To assist in achieving this, Council has implemented this policy and associated procedures and guidelines.

- 5.3 Council's commitment will be met by:
- a. Maintaining a strong and effective system of internal controls and compliance with those controls;
  - b. Taking a risk management approach to the prevention, identification and management of fraud and corruption and regularly undertaking fraud risk assessments;
  - c. Establishing formal procedures for fraud prevention, monitoring and investigation of allegations of dishonest and/or fraudulent behaviour;
  - d. Reporting all allegations of fraud or corruption to the CEO or D/CEO;
  - e. When allegations are proven to be true following investigation by the appointed investigating officer, reporting the outcome of the investigation to the CCC liaison officer who will arrange with the relevant person to take appropriate disciplinary action and/or will refer the matter to the relevant agency (eg. Crime and Corruption Commission, Queensland Police Force, Queensland Audit Office etc.);
  - f. Ensuring all Councillors and staff are aware of their obligations in combating dishonest and fraudulent behaviour by issuing these persons with a copy of the relevant Code of Conduct and associated policies and procedures and providing appropriate training on a regular basis;
  - g. Cultivating and maintaining an environment in which dishonest and fraudulent behaviour is actively discouraged,
  - h. Council will develop a Public Interest Disclosure Process.

## 6. Responsibilities

Responsibility for fraud and corruption prevention rests with all levels of management, Councillors, employees, volunteers and agency or contract staff who represent Tablelands Regional Council and who collectively must accept ownership of the controls relative to this policy.

### 6.1 CCC Liaison Officer

The CCC Liaison Officer facilitates the legal requirements between management and the CCC.

### 6.2 Chief Executive Officer (CEO)

The CEO has principal responsibility for fraud and corruption control to ensure compliance with the policy and appropriate governance structures are in place.

### 6.3 General Managers (GMs) and Managers

GMs and Managers have a responsibility to:

- 6.3.1 Provide guidance and instruction to all staff relative to responsibilities and reporting requirements;
- 6.3.2 Identify risk exposures to fraudulent and corrupt activities within their departments, groups and sections;
- 6.3.3 Establish controls and procedures for the prevention and detection of such activities;
- 6.3.4 Undertake risk assessments on fraud control; and

- 6.3.5 Implement action plans and mitigation strategies identified through the risk assessments;
- 6.3.6 Maintain effective auditing and reporting on key financial and other systems.

## 6.4 Councillors

Councillors shall be aware of and comply with this policy and associated procedures and guidelines.

## 6.5 Audit Committee

The Audit Committee is assigned with the responsibility for evaluating Council's exposure to fraud and corruption and advising on the implementation of risk management measures.

## 6.6 Department Managers

Councillors and employees will be informed of Council's fraud and corruption prevention policy. This policy shall be included in the induction program for new Councillors, employees and volunteers.

## 7. Training and communication

Tablelands Regional Council regularly communicates this policy and associated documents to Councillors, management, officers, employees, consultants and contractors. Internal mandatory training on supporting this policy shall be scheduled by the People & Culture Group as required.

Council's approach to fraud and corruption prevention will also be communicated through the internal staff newsletter, intranet and workgroup meetings. Contractors and other agents will be alerted to the contents of this policy in writing and through Council's contracting arrangements.

## 8. Related TRC Documents

- 8.1 *Local Government Act 2009*
- 8.2 *Local Government Regulation 2012*
- 8.3 *Crime and Corruption Act 2001*
- 8.4 *Public Interest Disclosure Act 2010*
- 8.5 *Integrity Act 2009*
- 8.6 Enterprise Risk Management Policy (PD 3.3.1)
- 8.7 Code of Conduct for Councillors (EX 1.1.16)
- 8.8 Employee Code of Conduct (CCS 5.1.2)
- 8.9 TRC Values - The TRC Way (CCS 5.1.16)

## 9. Responsibility

Council is responsible for the adoption, amendment and repeal of the Policy and the Chief Executive Officer is responsible for the development and amendment of any associated procedures and guidelines relevant to the Policy.

## 10. Review

It is the responsibility of the General Manager Organisational Services to monitor the adequacy of this policy and recommend appropriate changes. This policy will be formally reviewed every three years or as required by Council.

This Policy is to remain in force until otherwise amended/repealed by resolution of Council.

**JUSTIN COMMONS**  
**CHIEF EXECUTIVE OFFICER**