

# Fraud and Corruption Prevention Plan

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## 1. Purpose

This Fraud and Corruption Prevention Plan outlines Council's approach towards the control of fraud and corruption at a strategic, tactical and operational level. This approach ensures that Council has corporate ownership of fraud and corruption control.

Council's commitment to preventing fraudulent or corrupt activity, and avoiding or managing conflicts of interests, will be demonstrated through the implementation of the measures and behaviours identified in this document.

## 2. City Strategy Outcome

5.1 – Be honest, transparent and accountable in all that we do.

## 3. Application

This Plan should be read in conjunction with the *Fraud and Corruption Risk Matrix*, which highlights residual risks that would benefit from treatment. Each suggested treatment is detailed within the Treatment Plan with assigned responsibilities and target dates for implementation included in Council's corporate reporting program. This is based on the state of Council's ethical maturity towards the control of fraud and corruption at the time of completion and outlines a staged process moving forward based on areas that would benefit from further attention.

## 4. Definitions

Fraud is defined as:

*Dishonest activity causing actual or potential financial loss to any person or entity including theft of moneys or other property by employees or persons external to the entity and where deception is used at the time, immediately before or immediately following the activity. This also includes the deliberate falsification, concealment, destruction or use of falsified documentation used or intended for use for a normal business purpose or the improper use of information or position for personal financial benefit.*

Corruption is defined as:

*Dishonest activity in which a Council Official or contractor of Council acts contrary to the interest of Council and abuses his/her position of trust in order to achieve some personal gain or advantage for him or herself for another person or entity.*

The general nature of corruption, and acts which may constitute corrupt conduct, are defined under sections 7, 8 and 9 of the *Independent Commission Against Corruption Act 1988* (ICAC Act).

'Council Official' in this Plan has the same meaning as defined in Council's Code of Conduct.

## 5. Background

Willoughby City Council is committed to upholding an ethical culture that creates a work environment that is resistant to fraud and corruption and is dedicated to implementing effective measures to minimise fraud and corruption risks.

The Council does not tolerate misconduct, fraudulent or corrupt conduct by any council official and will take appropriate action against Council Officials who have perpetrated such behaviour, and those who allowed it to occur.

Council is committed to building a corruption resistant culture through:

- The prevention and deterrence of an opportunity for fraudulent or corrupt conduct by employees, Councillors, members of the public, contractors and clients.
- The detection, investigation and disciplining and/or prosecuting fraudulent or corrupt conduct.
- The Reporting of any fraud or corrupt conduct to the Independent Commission Against Corruption (ICAC) and other authorities where appropriate.

## 6. Objectives

The key objectives of the Fraud and Corruption Prevention Plan are:

- To demonstrate the commitment of the Mayor, Councillors, Chief Executive Officer, executive and senior management to combat fraud and corruption.
- Outline the high-level processes that will be implemented by Council to prevent, detect and respond to fraudulent and corrupt behaviours.
- Set out the responsibilities of managers and staff in relation to fraud and corruption control; and
- Ensure that Council policies and procedures that combat fraud and corruption and encourage ethical behavior are integrated in a single strategic framework.

## 7. Preventing Fraud and Corruption

At all levels, whether they are strategic, tactical or operational, Council Officials are committed to prevent fraud and corruption.

### 7.1 Strategic

At a strategic level, the elected Council commits to the endorsement of fraud and corruption control.

Through the Executive Leadership Team (ELT), key strategic initiatives are executed, ensuring that Council adopts an approach that adequately addresses the risk of fraud and corruption.

On this foundation, the 'Tone at the top' is practiced, benchmarked and evaluated, thereby ensuring that Council has set a standard for the management of fraud and corruption in local government taking complete ownership for its prevention, detection and response.

## 7.2 Tactical

At a tactical level, senior managers ensure that the risk of fraud and corruption is sufficiently controlled and minimised, promoting an organisational culture which rejects the notion of fraud and corruption as being acceptable. Through a holistic, integrated methodology, with key accountabilities, benchmarked and reported against, Council can tactically integrate fraud and corruption control within the core business of Council, its systems, processes and functions.

## 7.3 Operational

At an operational level, all stakeholders undertake to ensure the adequate mitigation of fraud and corruption within their respective roles. Within the internal control environment, opportunities for fraud and corruption can be limited, through adherence to documented policies, processes and systems. An ethical workplace culture ensures that all staff take ownership and accountability for their actions, and through a climate of open communication, are confident that any concerns can be raised and will be attended to. For this Plan to be successfully implemented, Council needs to ensure that it has both a strong internal control environment and an ethical workplace culture.

# 8. Fraud and Corruption Principles

Fraud and corruption are serious matters. Council undertakes to:

- Apply a 'zero-tolerance' attitude towards fraud and corruption, ensuring that any observer is encouraged to report concerns confidentially and without fear or favour.
- Ensure that the 'Tone at the top' is actively and regularly practiced, promoting a climate of openness, honesty, integrity, and ethical behaviour.
- Actively create and nurture a culture of open communication, with clear accountabilities in an ethically-conducive environment that supports vigilance, diligence and courage to report concerns.
- Facilitate ongoing dialogue about fraud and corruption and their detrimental effects, promoting Council-wide ownership, the notion that all staff are accountable for the prevention of fraud and corruption and must not condone or ignore potentially suspicious practices.
- Ensure that fraud and corruption prevention is built into core business practices, rejecting fraud and corruption where possible, but detecting it, if it occurs.
- Ensure that Council adopts an approach that is reliably informed by a risk-based methodology, with sufficient strategies and treatments implemented and benchmarked.

These principles will be supported by the following:

- An assessment of Council's ethical health, measured by a *Fraud and Corruption Control Health Survey*.
- A Fraud and Corruption Prevention Plan, supported with clear, concise and well publicised policies.
- Education and training to Council Officials in fraud and corruption awareness and understanding, methods of detection and options for bringing concerns to the attention of Council.
- Ensuring that any suspected instances of corruption are received, objectively and independently assessed, investigated and brought to the attention of the ICAC and/or the police.
- Recovering proceeds of fraudulent and corrupt activity and applying consistent sanctions to any Council Official who has committed fraud or corruption.
- A rolling program of strategically implemented initiatives, informed by a risk-based methodology designed to manage, mitigate and address fraud and corruption in all their guises.

- Implementation of key accountabilities for employees. This includes:
  - A Risk Profile of positions, with key accountabilities and attributes contained within specific positions descriptions based on the level of exposure to fraud and corruption risk.
  - Staff in managerial roles, high risk functions, or responsibilities for managing third parties having specific accountabilities for managing fraud and corruption risks.
  - Documented accountabilities within employees' Key Performance Indicators (KPI) linked to position descriptions and evaluated on a periodic basis.
- Providing specialised training for employees involved in key fraud and corruption prevention activities.
- Ensuring that a Fraud and Corruption Control Coordinator is appointed, with a sufficient remit and delegation to implement and monitor Council's ongoing adherence with the Fraud and Corruption Prevention Plan.
- Ensuring that the Fraud and Corruption Control Coordinator reports functionally to the ELT and Audit, Risk and Improvement Committee (ARIC) on the implementation of the Fraud and Corruption Prevention Plan.
- Ensuring that the Fraud and Corruption Control Coordinator has designated responsibilities for the implementation and monitoring of the fraud and corruption program, utilising a Treatment Plan to ensure implementation and adoption of key initiatives within business owners and target dates.

## 9. Key Roles, Responsibilities and Accountabilities

Successful prevention of fraud and corruption at Council requires commitment from all employees with responsibilities clearly defined and agreed upon as a condition of employment. Senior employees are expected to model ethical standards of best practice, fostering a culture of open communication and ensuring that staff within their business areas are accountable and supported.

The elected Councillors and the Chief Executive Officer have specific responsibilities for ensuring that Council develops and implements a framework that is appropriate for its fraud and corruption risks and for overseeing the effective implementation of associated measures. At the end of each year, the Chief Executive Officer attests to this within the following statement to Council for their endorsement and publication in Council's Annual Report:

Suggested statement from the Chief Executive Officer to the Elected Council each year:

*"Having considered all the principles, I am satisfied [subject to the Fraud and Corruption Prevention Plan/Risk Assessment/Actions, etc.] that Council has adopted a response that is appropriate for its fraud and corruption risks and commits to maintain its vigilance to tackle fraud and corruption".*

The key responsibility points for the implementation of this Fraud and Corruption Prevention Plan:

### 9.1 Council Officials

Required to take responsibility for ensuring the integrity of Council's management and practices, including by preventing, detecting and identifying fraud and corruption risks and contributing to the implementation of risk treatments, as appropriate. Council Officials are required to report any suspected fraudulent or corrupt activity or inadequate system controls in accordance with Council's Code of Conduct and relevant policies.

### 9.2 Chief Executive Officer

The Chief Executive Officer is accountable for governing the organisation in a way that promotes the proper use of public resources and assets. This includes appropriately resourcing governance, risk and internal audit functions to enable an effective program of fraud and corruption prevention, detection and rectification where required. Will keep the Council and the Audit, Risk and Improvement Committee properly informed of relevant risks in this area.

### **9.3 Customer and Corporate Director**

The Customer and Corporate Director has primary accountability for all risk management activities which includes oversight of all fraud and corruption prevention activities on behalf of Council. They will ensure that a Fraud and Corruption Control plan is established, implemented and maintained in accordance with the Policy.

### **9.4 Governance, Risk and Corporate Planning Manager**

Will oversee fraud and corruption prevention activities across the Council, taking advice from the Audit, Risk and Improvement Committee and Council's ELT. Primary point of contact for advice on the implementation and administration of the Policy and Control Plan. More specifically the Manager Governance, Risk and Corporate Planning will:

- Assess and recommend appropriate internal controls to enhance Council's fraud and corruption prevention activities.
- Act as a knowledge base and be a point of contact for colleagues with questions on fraud and corruption prevention.
- Develop an organisation wide Fraud and Corruption Prevention Training Program.

### **9.5 Risk and Audit Team Leader**

Will assist the Governance Risk and Corporate Planning Manager to implement fraud and corruption prevention activities across the Council. More specifically the Risk and Audit Team Leader will:

- Provide timely and adequate information to the ELT and the Audit, Risk and Improvement Committee on the status of the Council's preparedness to prevent fraud and corruption from occurring.
- Ensure reports are provided to the Audit, Risk and Improvement Committee and the ELT on the status of the implementation of the Fraud and Corruption Prevention Plan.

### **9.6 Audit, Risk and Improvement Committee**

Provides general oversight and monitoring of the effectiveness of the Council's fraud and corruption prevention activities. Specifically the Committee will:

- Ensure that audit plans and scopes for individual audits are adequate to give assurance that fraud and corruption risks are well managed.
- Advise Council annually, via the ARIC Chairman's report to Council, on the effectiveness of risk management activities including fraud and corruption prevention.

### **9.7 Managers**

Responsible for implementing effective internal fraud and corruption controls in their operational activities. Some Group Managers and Managers will have additional responsibilities as identified in the Fraud and Corruption Prevention Improvement Plan.

### **9.8 Fraud and Corruption Prevention Manager**

Council will appoint a staff member to act as Fraud and Corruption Prevention Manager, who has a clearly defined responsibility for oversight of the Fraud and Corruption Prevention Plan, will ensure that key deliverables are addressed. This person will also be a key contact point for all staff wishing to report any potential fraud or corruption.

## 10 The 'Dozen Dimensions' of fraud and corruption control: 12 key elements of best practice

This Plan incorporates 12 Dimensions of fraud and corruption control, each of which are interrelated, but have distinguishing features. A holistic and integrated approach minimises the risk or reality of fraud and corruption, hence each Dimension should not be viewed exclusively of others as this plan's key strength is through integration and harmonization of these controls.

This model has been informed by various best practice publications including, but not limited to, the following, noting the various determinants of fraud and/or corruption:

- Corruption and Crime Commission, *Fraud and Corruption Control: Guidelines for best practice*, Queensland.
- NSW Audit Office, *Fraud Control Improvement Kit*, New South Wales.

The NSW Audit Office identifies a framework in which all components sit within the themes of prevention, detection and response.

In this document Council will outline, for each dimension, the high-level processes and behaviours that will be implemented in Council's fraud control framework.

This model has twelve dimensions:

1. Leadership Principles
2. Accountability and Ownership Structure
3. Fraud and Corruption Prevention Plan and associated policy framework
4. Risk Based Prevention
5. Internal Control Environment
6. Reporting Framework (1): Internal reporting of fraud and corruption
7. Reporting Framework (2): External reporting of fraud and corruption
8. Public Interest Disclosure (PID) awareness, management and compliance
9. Investigatory framework: assessment, investigations and sanctioning
10. Ethical Conduct Framework
11. Education, Awareness and Understanding
12. External party awareness and management (Customers, Clients and the Community).



The dimensions are spread across the three themes of prevention, detection and response. Each dimension may contribute to more than one theme.

This plan acknowledges the premise that while strong systems and processes limit opportunities for fraudulent or corrupt behaviour, both fraud and corruption are committed by people. People may commit fraud or corruption, or may collude in, or condone such behaviour, even with the most rigorous of systems and processes in place.

A focus on an ethical workplace culture complements the implementation of strong systems and processes, thereby making Council more resistant to the possibility of fraud and corruption. Strong leadership, coupled with a clearly defined accountability and ownership structure, sets a 'tone at the top' which then determines what is required operationally to prevent, detect and respond to fraud and corruption.

## CORPORATE ACCOUNTABILITY AND CULTURAL OWNERSHIP

### 10.1 Leadership principles

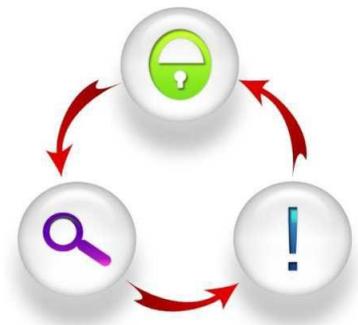
A commitment to prevent and control the risk of fraud and corruption must be endorsed by Council's elected body and visibly established by the ELT. The ELT and senior management must exemplify an ethical *Tone at the Top*, with documented accountabilities and responsibilities for preventing fraud and corruption. This demonstrates that Council will reject the notion of fraud and corruption as being acceptable, by taking ownership of Council's fraud and corruption risks and attesting to the success of this Plan each year to the elected Council.



### 10.2 Accountability and ownership structure

Responsibilities for preventing fraud and corruption should be clearly documented and understood by both management and staff within Council ensuring that the entire workforce is accountable for the prevention of fraud and corruption.

Core business activities should ensure that fraud and corruption is prevented or detected. Heightened responsibilities are allocated to staff who operate in high risk functions, to ensure that they are sufficiently equipped with the knowledge and skills to prevent, detect and respond to fraud and corruption.



A staff member will be appointed as Fraud and Corruption Prevention Manager and they will have overall responsibility for managing all attributes associated with the Fraud and Corruption Prevention Plan, but the responsibilities must be assigned to Council's risk owners. The Chief Executive Officer's attestation each year ensures that Council has taken all reasonable steps to adopt a response that is appropriate for its fraud and corruption risks and commits to maintain its vigilance to tackle fraud and corruption.

**PROCESSES AND BEHAVIOURS 4  
STEP CYCLICAL APPROACH:  
DETERENCE, PREVENTION, DETECTION, RESPONSE**

**10.3 Fraud and Corruption Prevention Plan and Associated Policy Framework**

Clear, well-documented and understood policies, complement the basis of this Fraud and Corruption Prevention Plan. Each policy must not operate in isolation, but as an inter-related statement. Each must communicate to all Council stakeholders what Council's stance is on the prevention of fraud and corruption and how it seeks to achieve this.

The Code of Conduct sets the expectation of the standards and behaviours of all staff and Councillors and should be clearly articulated and well understood.

Council has in place a robust fraud and corruption prevention framework that is led by a Fraud Control Policy and supported by necessary policies, systems, and procedures to minimise fraud and corruption in all areas and at all levels. These policies, systems and procedures will be proportionate and specific to the fraud and corruption risks faced by Council.



**10.4 Risk-based prevention**

Council's approach to the control of fraud and corruption is based on the principles of a risk- based methodology.

The Fraud and Corruption Risk Matrix unpacks the key components of fraud and corruption in terms of how each might manifest within Council, against Council, or by Council staff, across the array of Council's diverse activities and functions.

The Fraud and Corruption Risk Matrix must be subject to regular review, based on the mitigation of residual risks and/or the inclusion of new ones. On the basis of the Matrix, a Treatment Plan outlines the specific controls that require implementation to mitigate the corresponding risk. Each should be constantly reviewed and documented against an annual plan, so that the Chief Executive Officer can attest to its significance at the end of each year.

This dimension ensures that Council is proactive in establishing robust, appropriate and effective prevention systems to minimise the likelihood of fraud or corruption occurring. It also ensures that Council creates an ethical workforce that understands the ethical behavior required of them in the workplace.



**10.5 Internal control environment**

A control climate is facilitated by strong ownership with accountabilities communicated within processes, positions descriptions, and embedded within the core business systems. Well understood policies and procedures govern this and encourage adherence. Weaknesses in any of these areas potentially allow fraud and corruption to continue without detection.



While every staff member at Council is expected to ensure that internal controls are working effectively, staff with managerial or supervisory responsibilities have an added expectation to ensure that controls are implemented, monitored and adhered to.

Managers and supervisors are best placed to identify system deficiencies that facilitate fraud and corruption and should be accountable for ensuring they are implemented and fit-for-purpose.

Every staff member of Council is responsible for preventing fraud and corruption and highlighting any suspicions to Council. Accountabilities should be reflected in position descriptions and benchmarked against Key Performance Indicators (KPI) or performance appraisals.

The Code of Conduct should be signed annually by all staff with adherence monitored by managers and supervisors (a component of each Position Description and KPI).

Well documented internal controls, which identify irregularities that are visibly acted upon, will give Council sufficient assurance that detection mechanisms are effective.

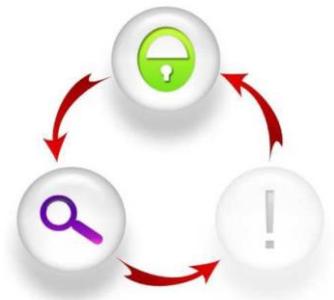
The Internal Audit function should ensure that any program evaluates the potential for fraud and corruption informed by the Fraud and Corruption Risk Matrix.

## 10.6 Reporting Framework (1): Internal Reporting of Fraud and Corruption

A robust reporting framework ensures that Council Officials have a mechanism for voicing concerns. While a formalised reporting framework might exist, staff may be fearful of raising concerns if they do not feel comfortable, are worried that their concerns will not be taken seriously or met with an adequate response, or met with retribution.

The framework is supported by Council's ELT, with staff encouraged and regularly reminded by their managers and supervisors that any concerns must be raised. Potential reporters must feel confident that Council's reporting framework will work to support their raising of concerns, otherwise corrupt practices fail to come to light.

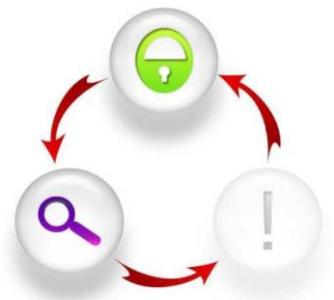
Regular dialogue, through a variety of communication channels, supported and advocated by a strong anti-fraud and corruption culture, will seek to ensure that the internal reporting framework is sound and credible.



## 10.7 Reporting Framework (2): External Reporting of Fraud and Corruption

As a further mechanism in the effectiveness of any reporting framework, external parties should be advised of Council's stance in relation to fraud and corruption control, and how they can raise concerns about Council or a Council Official if they suspect fraud or corruption to be taking place.

This highlights that Council will take issues seriously if advised, and commits to acting ethically, transparently and accountably in the conduct of business or interaction with external parties. Further, it ensures that external parties have a range of options available to them if they wish to voice concerns about potentially fraudulent or corrupt conduct.

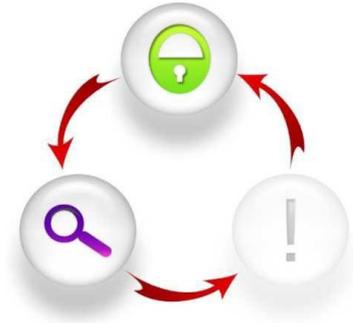


## 10.8 Public Interest Disclosure (PID) awareness, management and compliance

The detection of fraud and corruption is mostly through reporting by employees; hence it is a fundamental component of this Plan that they are advised of the channels for making a disclosure and reassured that they are protected by state-based legislation which seeks to protect their confidentiality and risk of reprisal action.

Ensuring that staff are aware of the *Public Interest Disclosures Act 1994*, what it means for them and how it facilitates the disclosure of wrongdoing in Council, is essential and must be regularly attended to in the delivery of a Fraud and Corruption Prevention Plan.

Impediments to reporting must be identified and remedied, dispersing the many factors which might inhibit disclosure of fraud and corruption. A first step in this process is the Public Interest Disclosure Policy, which must complement other related policies, and be well understood by any Council Official who may wish to make a disclosure.



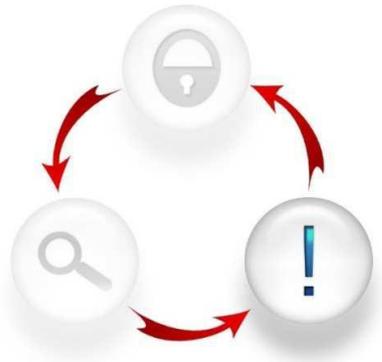
## 10.9 Investigatory framework: assessment, investigations and sanctioning

When concerns are raised, they must be met with an adequate investigative response; assessed in a consistent, methodical way, and pursued to the requisite investigative standard with an adequate sanction applied to anyone who perpetrates or condones fraud and corruption.

Aside from the inherent skills that might be required for any investigative role, factors such as apprehension of bias and conflict of interest must also be considered, delegation of appropriate powers, accompanied with sufficient time and resources and the authorisation and endorsement of the ELT.

This dimension ensures that policies and procedures are in place to ensure that internal investigations, whether conducted internally or outsourced, should be consistent with commonly used investigation standards.

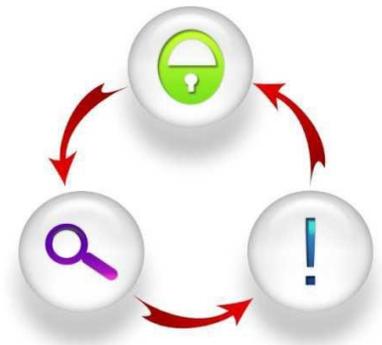
This dimension also ensures that all employees understand that fraud and corruption will not be tolerated by the Council, and those found to have engaged in such conduct will face disciplinary action. The Council expects that all staff will act in an ethical manner and in accordance with the standards of behaviour set out in the Code of Conduct.



## 10.10 Ethical Conduct Framework – Clear Communication of the Code of Conduct

Council's fraud control framework is part of a much bigger ethical framework that guides the values of the Council and provides standards for behaviour and decision-making. The ethical framework sets the organisational culture that is fundamental to the success of a fraud control framework.

The Code of Conduct is the cornerstone of Council's ethical framework. It outlines the standards and expectations of Council staff and Councillors and is a key resource that seeks to develop organisational integrity and ethical best practice.



However, whilst all councils are required to have a Code, the administration and operation is often the aspect that is not given sufficient attention. Adherence to the Code is based on clear understanding, a valued ethical workforce, and a strong commitment that Council will address any situations which may indicate that fraud and corruption has been perpetrated. The Code must be sufficiently robust and complement Council's suite of relevant policies which focus on fraud and corruption risks (Gifts and Benefits, Secondary employment, Conflict of interest, etc.).

This strategy ensures that Council has in place the necessary policies, systems, and procedures to minimise fraud and corruption in all areas and at all levels. These policies, systems and procedures will be proportionate and specific to the fraud and corruption risks faced by Council.

### 10.11 Education, awareness and understanding

Council Officials are a prime source of information on suspected frauds in their area. This dimension aims to make best use of this valuable resource, to ensure that Council Officials are aware of what fraud is, common types of fraud they may encounter, their responsibilities and how to report suspected frauds.

Comprehensive fraud and corruption education and awareness campaigns will integrate a range of educational and awareness strategies. They will seek to institutionalise a culture that is receptive to, and will seek to reject, the concept of fraud and corruption.

While training might make Council Officials aware of their obligations under the Code of Conduct, associated policies and Council's commitment to fraud and corruption prevention, long-term behaviour change requires a regular reinforcement of knowledge about why fraud and corruption should not be tolerated.

The Code of Conduct outlines the standards and expectations of Council Officials, but training might not provide comprehensive coverage of fraud and corruption, nor work through the kind of ethical dilemmas that many staff may encounter daily. In this regard, education differs to compliance-based training. It ensures that understanding is not restricted to being a compliance-based activity, but ensures that Council values its workforce and empowers them to act in a responsible, accountable and ethical way.



### 10.12 External Party Awareness and Management (Customers, Clients and the Community)

How Council manages external parties that have a vested interest in the business activities of Council is crucial, as is any awareness of the part of the external stakeholder in how Council conducts business and how it will treat instances of suspected fraud or corruption.

This dimension also ensures that customers, the community and suppliers understand that the Council will not accept fraudulent or corrupt behaviour in its dealings, and that they are aware of the consequences of such fraudulent or corrupt behaviour.

Managing external party awareness and relationships requires a significant degree of forethought depending on the messages that Council would like to convey and the target audience (customers, clients, community).



## 11. Review timeline

This Plan will be reviewed when any of the following occur:

- 12 months from the date of implementation of the Treatment Plan.
- New and or emerged risks requirement amendments to be made to the Treatment plan.
- Any other circumstances determined by the Chief Executive Officer.

Date Adopted/ Approved:	8 April 2019
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	June 2021
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Responsible Position:	Manager Governance, Risk and Corporate Planning
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