

	LG537 Fraud Prevention
Key Focus Area Leadership and Governance	Relevant Council Delegation Nil

Purpose

The purpose of this policy is to articulate the Council's:

1. Commitment to integrity and zero tolerance of fraud, corruption and bribery in all forms.
2. Support for the development of systems and processes to obstruct fraudulent activities, ensure adequate oversight, separation of duties, detection, identification and reporting of breaches.
3. Requirement that all Council Members, Committee Members and employees are accountable and behave with integrity, ethically and honestly when performing their duties and during their interactions with stakeholders.

Policy

To support this vision Council will provide sufficient resources to enable the Town's administration to implement a coordinated approach to manage the risk of fraud by:

1. Assessing fraud risks across the organisation.
2. Supporting the development of systems and processes to obstruct fraudulent activities, ensure adequate oversight, separation of duties, detection, identification and reporting of breaches.
3. Developing an Integrity Strategy and reviewing it annually.
4. Developing and implementing a periodic fraud awareness and prevention training program for employees.
5. Ensuring that all conflicts of interest and financial interests are disclosed, recorded and assessed.
6. Creating a strong ethical culture that sets the standard of behaviour, including the identification of fraud risks and reporting mechanisms and obligations to act accordingly.
7. Ensuring clear internal processes and systems to report any potential fraud, including anonymous reporting.

8. Periodic reporting to the CEO and Audit and Risk Management Committee.
9. Investigating all identified or suspected fraudulent or corrupt conduct.
10. Ensuring appropriate reporting, disciplinary action, prosecution and recovery actions are initiated by the Town.
11. Collecting and analysing information received about potential fraud to identify any trends or emerging issues.
12. Maintaining policies and procedures to verify the identity and integrity of employees, contractors and suppliers.

This policy, in conjunction with the Town's Code of Conduct for Council Members, Committee Members and Candidates, the Employee Code of Conduct, Risk Management Framework, Integrity Strategy and Public Interest Disclosure Policy aligns with the Town's corporate culture and values to prevent, detect and respond to potential or actual fraud and misconduct and minimise risks to the Town, its people and its assets.

Document Control Box			
Business Unit:	Governance		
Legislation:	<i>Local Government Act 1995</i> <i>Local Government (Model Code of Conduct) Regulations 2021</i> <i>Local Government (Financial Management) Regulations 1996</i> <i>Local Government (Audit) Regulations 2007</i> <i>Local Government (Administration) Regulations 1996</i> <i>Local Government (Functions and General) Regulations 1996</i>		
Organisational:	Employee Code of Conduct Code of Conduct for Council Members, Committee Members and Candidates Integrated Risk Management Framework LG509 - Purchasing LG512 - Corporate Purchasing Cards Human Resources Recruitment and Selection Guidelines Town of Claremont Integrity Strategy		
Review Frequency:	Annual	Next Due:	2024
Version #	Decision:	OCM Date:	Resolution Number:
1.	Adopted	16 February 2021	020/21
2.	Modified	25 July 2023	094/23