PORTFOLIO FRAUD AND CORRUPTION PREVENTION PLAN 2019-21

Policy Statement

The Environment, Planning and Sustainable Development Directorate, City Renewal Authority and Suburban Land Agency (referred to collectively as the Portfolio) have a zero-tolerance policy towards fraudulent activity or corrupt behaviours by staff, contractors, third party service providers, and clients.

The Portfolio is strongly committed to preventing, identifying and eliminating fraud and corruption and raising awareness within the Portfolio. To enable this we promote a culture of learning, disclosure, transparency and accountability, where it is safe to learn from genuine mistakes and raise questions and concerns.

The act of committing fraud or corruption within the Portfolio is a very serious matter and will not be tolerated. Any such acts will be dealt with to the maximum extent possible within the law, and will be reported to the Police for investigation and prosecution where appropriate.

Purpose

The Portfolio Fraud and Corruption Prevention Plan 2019-21 (the Plan) has been developed to raise awareness of fraud and corruption. It also aims to assist Portfolio staff to prevent, detect and report suspected fraud and corruption and guide the management of cases of alleged fraud and/or corruption. This Plan should be read in conjunction with the Portfolio Integrity Framework (Framework) which outlines the integrity management response arrangements, activities and obligations required of the Portfolio and its staff. The Framework draws together relevant policies to ensure staff are aware of their responsibilities to act ethically and appropriately recognising the trust of the community.

Part 2.3 of the *Public Sector Management Standards 2006*, requires agencies to adopt an active preventative strategy towards the control of all breaches of integrity, including fraud and corruption. The ACTPS *Integrity Policy 2010* (Integrity Policy) aims to prevent the incidence of fraud and corruption through the implementation and regular review of a range of fraud prevention and detection strategies. The Integrity Policy also requires agencies to undertake a fraud and integrity risk assessment and review their Fraud and Corruption Prevention Plans at least once every two years.

Fraud and corruption risk management forms part of the business planning cycle and contributes to business performance through minimisation of the Portfolio's risks. This provides assurance to Executives, portfolio agency Boards and relevant audit and risk committees that appropriate fraud and corruption risk management is occurring within the Portfolio.

Scope

This Plan applies to all Portfolio staff including:

- Permanent and temporary ACT Government personnel and executives;
- Board members of the City Renewal Authority and the Suburban Land Agency performing their functions for their respective territory authority

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- Non-government personnel including contractors and consultants acting for, or on behalf of, the Portfolio.

Definitions

Term	Definition
Corruption (as defined in the ACTPS Integrity Policy 2010)	In relation to an employee, [corruption] means that the employee seeks, obtains or receives any benefit, other than lawful salary and allowances on the understanding that the employee will do or refrain from doing anything in the course of their duties or will attempt to influence any other employee on behalf of any person. Examples of corruption include: • Manipulating a tendering process to achieve a desired outcome • Unauthorised use of government facilities and time to operate a private business • Misusing information or material obtained during the course of official duties • Overstating working hours or claiming an allowance when not eligible • Receiving personal benefits in exchange providing inappropriate advantage to commercial partners (e.g. supplies, Lessees, etc) or other (e.g. levy payers, developers etc) • Not disclosing and/or allowing a conflict of interest to obtain a preferred outcome.
Fraud (as defined in the ACTPS Integrity Policy 2010)	Taking or obtaining by deception, money or another benefit from the government when not entitled to the money or benefit, or attempting to do so – this includes evading a liability to the government. Fraud is not restricted to obtaining monetary or material benefit. The benefits of fraudulent acts can either be tangible or intangible. Examples of fraud include: • Assisting others to obtain a benefit • Theft of money (cash, cheques, EFTPOS) due to the government

	• Charging personal expenditure on government credit or fuel cards
	• Unapproved use and misuse of motor vehicles and other government assets
	• Raising fictitious invoices
	• Submitting false claims for reimbursement
	• Releasing misleading or inaccurate information for the purpose of deceiving, misleading or to hide wrong-doing.
Portfolio	Includes the administrative unit as determined by the Administrative Arrangements (currently the Environment, Planning and Sustainable Development Directorate, City Renewal Authority and Suburban Land Agency) and their staff.

Roles and Responsibilities Across the Portfolio

The following roles and responsibilities are common across the Portfolio.

Role or Position or Business Area	Responsibility
Senior Executive Responsible for Business Integrity and Risk (SERBIR)	• Ensure the Portfolio has a current Fraud and Corruption Prevention Plan and that this plan is reviewed at least every two years • Monitor the Plan's implementation and coordinate any risk treatments • Act as the primary senior executive point of contact for allegations of fraud and corruption and determine how escalated allegations should be handled • Promote a culture of a well-informed, engaged and ethical workforce. • Provide oversight and make decisions on the direction of enquiries related to fraud and corruption • For EPSDD, ensure that Risk Registers reflect fraud and corruption risks and are regularly reviewed and updated • For EPSDD, report to the Audit Committee, Executive Steering Committee, and Executive Management Board on the implementation of the Plan • Ensure that the Plan is brought to the attention of staff through training sessions, intranet or other media

Role or Position or Business Area	Responsibility
	• Review effectiveness of fraud and corruption prevention measures following significant functional or structural changes.
Disclosure Officers	• Appointed under the *Public Interest Disclosure Act 2012* • Responsible for undertaking initial assessments of a disclosure (and decide whether a disclosure is a public interest disclosure), where and how public interest disclosure should be investigated, and act as a central coordination point for all matters relating to public interest disclosures (which may be suspected cases of fraud and/or corruption, or breaches of the ACTPS Code of Conduct)
Executive Branch Manager, People and Capability	• Ensure HR Delegations are up to date, accurate and accessible by all staff • Review HR Delegations at least once a year • Coordinate the development and delivery of training programs, including on fraud, corruption and ethics.
Chief Finance Officers	• Ensure Director-General/CEOs Financial Instructions are update to date, accurate and accessible by all staff • Review Financial Instructions at least once a year or as required.
All staff	• Become familiar with the Plan and contribute to its effective implementation, thereby assisting in minimising the incidence of fraud and corruption within the Portfolio • Report any fraudulent activity or corrupt behaviour within the Portfolio that they become aware of or suspect. Reports can be made to managers/supervisors, any executive within the Portfolio or the SERBIR • Ensure declarations of any conflict of interest, either actual, potential or perceived, are made immediately that the conflict becomes apparent • Comply with the *Public Sector Management Act 1994*, specifically section 9 – General obligations of public employees, the ACTPS Code of Conduct and the ACTPS Values and Signature Behaviours.

Role or Position or Business Area	Responsibility
Integrity Commission	• The ACT Integrity Commission is established under the *Integrity Commission Act 2018* and is scheduled to commence on 1 December 2019 • The Integrity Commission is an independent body which has the power to investigate corruption in public administration and strengthen public confidence in government integrity.

Although the Plan applies to all Portfolio staff, there are specific roles and responsibilities in positions unique to individual agencies.

- <u>Attachment A</u> – Roles and responsibilities within EPSDD
- <u>Attachment B</u> – Roles and responsibilities within in the City Renewal Authority
- <u>Attachment C</u> – Roles and responsibilities within the Suburban Land Agency

Plan Requirements

The Portfolio's approach to fraud and corruption control is based on mitigation, detection, investigation and response.

A. Mitigation

The Portfolio endorses fraud and corruption control activities and promotes a culture of staff reporting potential cases of fraud and corruption.

Executives 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, reviewed and updated regularly and understood by staff.

1. Mitigation Measures

The Portfolio implements the following fraud and corruption mitigation measures:

- Fraud and Corruption Plan and procedures are available to staff and brought to their attention by the SERBIR, executives and managers
- Staff training, including on fraud, corruption, integrity and ethics
- Fraud and corruption control expectations are included in the new staff induction program and regular mandatory training
- Portfolio fraud and corruption risk assessments are conducted at least every two years
- Business unit-specific risk assessments should include consideration of fraud and corruption risks

- Staff are made aware of their obligations under the relevant legislation, policies and procedures

- Conflict of interest policies and procedures are regularly communicated to staff

- The Appointments and Delegations Register as well as individual appointment and delegation instruments, including the DG's/CEOs' Financial Instructions and HR Delegations, are regularly reviewed and updated and available to all staff

- Responsibilities for fraud and corruption control are contained in role descriptions where appropriate

- Facilitation of the annual ACT Audit Office and Audit Committees financial statements review.

2. *Staff Awareness and Training*

The most effective tool to prevent fraud and corruption is a well-informed, engaged and ethical workforce, one which is prepared to uphold sound administrative decision-making and disclose fraudulent activities and corrupt behaviours. It is the responsibility of all staff to act honestly and with integrity at all times, and to be vigilant in detecting possible incidents of fraud and corruption.

The EPSDD Portfolio requires all staff to complete mandatory training courses within the Essentials Framework and Managers and Supervisors Framework, including fraud and ethics. EPSDD has launched an e-Learning package on fraud, corruption and ethics. Legal Services and Integrity is providing Integrity training as part of the EPSDD Learning and Development Framework.

Targeted fraud and corruption prevention awareness training can be presented to business units that have a higher disposition to potential fraud and corruption risks.

3. *Fraud and Corruption Risk Assessment*

A fraud and corruption risk assessment measures the vulnerability of an organisation to fraud and corruption and is essential for fraud mitigation and control. At least once every two years, a targeted fraud and corruption risk assessment is conducted across the Portfolio.

In the development of this Fraud and Corruption Prevention Plan 2019-2021, a fraud and corruption risk assessment was conducted across the Portfolio and identified four fraud and corruption risks, of which two were high (fraudulent or corrupt conduct occurs when procuring goods or services and failure to protect personal and corporate information) and two were medium (misuse of public property and money and misuse of delegations, position and/or workplace entitlements) (see Fraud and Corruption Risk Assessment Attachment D).

As part of their regular assessment of risk, business units are required to ensure that fraud and corruption risks are identified and reported to Audit and Risk/Authority Chief Operating Officer/ Governance and Policy Area for the reported risk to be captured into the relevant Risk Register. The most important outcome of a fraud and corruption risk assessment process is the development of an effective anti-fraud and corruption treatment program that specifically addresses the risks faced by the Portfolio. Treatments should be measured for effectiveness over time.

4. Supplier Controls

In some circumstances, the provision of services to the ACT Public Services is most appropriately provided by the private sector. The *Government Procurement Act 2001* sets out the framework within which these services are obtained.

The Portfolio communicates and enforces its expectations, relating to fraud and corruption control via contractual agreements with private sector providers.

The ACT Government has implemented a whole of government Accounts Payable Invoice Automation Solution (APIAS). This system requires separation between the coding of an invoice received (and confirmation that the goods and/or services have been received in accordance with a contract and the amount is correct) and the financial delegate approving payment.

5. Internal Policies

The following internal policies and procedures are available to all staff via intranets and regular all-staff emails:

- Portfolio Integrity Framework
- ACTPS Integrity Policy 2010
- Director-General's/CEOs' Financial Instructions
- Enterprise Agreements
- Human Resource Delegations
- Conflict of Interest Factsheet
- Purchase of Land By Portfolio Staff, Contractors and Public Sector Members Policy
- Gifts and Hospitality Policies
- ACT Government - Acceptable Use of ICT Resources Policy
- ACT Government Public Interest Disclosure Guidelines (adopted by EPSDD, the City Renewal Authority, and the Suburban Land Agency).

B. Detection

Fraud and corruption can be detected by establishing effective accounting and system controls and by recognising variations from standard practice. In addition, staff cooperation, observation and initiative are important in preventing and detecting fraud and corruption in the workplace.

1. Fraud and Corruption Signals

Managers and staff should be alert to the common signs of fraud and corruption. Signals for potential fraud and corruption may include:

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- Implausible excuses and reasons for unusual events or actions
- Senior staff involved in routine process work such as purchasing, ordering and receiving 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
- Undue secrecy, or excluding people from available information
- Staff who treat controls and standard practices 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.

2. Reporting

If a staff member becomes aware of possible fraud and corruption, they are obliged to report their concerns. In the first instance, it is generally best to report any concerns to an immediate supervisor.

Suspected cases of fraud and corruption relating to human resources matters (such as obtaining a staff entitlement fraudulently or corrupt conduct during a recruitment process) should be reported to People and Capability Branch, However, staff members may raise their concerns with any member of the Executive and/or the SERBIR.

Staff should report suspicions to only those people who absolutely need to know. This protects people from allegations that may not be proven and prevents the possible destruction of evidence.

3. Public Interest Disclosure

The *Public Interest Disclosure Act 2012* (PID Act) supports the reporting, assessment and investigation of reported wrongdoing by an ACT public servant, including fraud and corruption. The PID Act and procedures adopted by agencies provide a method of investigating allegations, while protecting the individual who has made the disclosure from any reprisals.

Members of the public, as well as current and former ACT public servants may make a public interest disclosure to any ACT government agency.

Disclosable conduct includes activity or conduct (or combination thereof) by an individual or an ACT Public Sector entity that is any of the following:

- Is illegal
- Misuses or wastes public money or resources
- Is misconduct

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- Is maladministration
- Presents a danger to the health or safety of the public
- Presents a danger to the environment.

4. *Financial Reporting and Data Analysis*

EPSDD Strategic Finance, Suburban Land Agency Strategic Finance and the City Renewal Authority Finance undertake monthly budget monitoring to track spending against budget and aim to identify any inconsistencies as soon as possible. All staff involved in the expenditure of government funds have a responsibility to ensure expenditure is lawful. This includes payment of funds, execution of contracts and internal budget management.

The ACT Audit Office and agencies' audit committees also conduct annual reviews of financial statements.

5. *Internal and External Audit*

All areas of the Portfolio are expected to comply with their respective policies and procedures and are subject to review under their respective internal audit programs, as well as external audits undertaken by the ACT Audit Office.

C. Investigation and Responses to Fraud and Corruption

Initial investigation into reported fraud or corruption will be made by the SERBIR who will determine whether there is any basis for further action. The SERBIR may appoint an officer within the Portfolio to undertake enquiries or may acquire the services of external experts to assist in the conduct of any inquiry. The SERBIR may refer the matter to the police for investigation and potential prosecution. During investigation processes allegations are assessed to determine whether there is any merit to further investigation and/or referral. The presumption of innocence applies, meaning that people alleged to have committed fraud and/or corruption are innocent until proven. People suspected of committing fraud or engaging in fraudulent conduct will be afforded natural justice.

In addition, a staff member committing fraud or engaging in corrupt conduct may be in breach of the *Public Sector Management Act 1994* – section 9 – and may be subject to separate disciplinary action. Possible outcomes of disciplinary action range from receiving a warning about the conduct to dismissal. The SERBIR may refer alleged breaches of the Public Sector Management Act to People and Capability, in the first instance. The Professional Standards Unit in CMTEDD undertakes all investigations if required, after completion of a preliminary assessment by the delegate.

Following the discovery of fraud or corruption, the SERBIR will determine if an internal control review is required. An internal control review will include a reassessment of the adequacy of the internal control environment (particularly those controls directly impacting on the fraud or corruption incident and potentially allowing it to occur) and will consider whether improvements are required. Where improvements are required, these should be implemented as soon as practicable.

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1. Advice to Line Area Managers

Line Area Managers are leaders in the Portfolio and are required to display high levels of integrity and probity in their work. They have an obligation to apply the Public Sector Management Act, the Code of Conduct and ACTPS Signature Values and Behaviours, and to make their staff aware of their obligations and appropriate behaviour.

Fraud and corruption allegations or suspected cases of fraud or corruption can be extremely sensitive and cause disruption in the workplace. Allegations of fraud and corruption are allegations until confirmed, and the presumption of innocence applies. Discretion is to be maintained and information on fraud and corruption investigations should be on a strict need to know basis. Who needs to know will vary from case-to-case. All public servants are bound by the *Information Privacy Act 2014* and therefore individuals who have made allegations of fraud and/or corruption or are the subject of an investigation are to have their privacy protected, in accordance with the Information Privacy Act and Information Privacy Policy.

Line managers provide support to their staff and may wish to encourage staff who have made an allegation or are the subject of an allegation to seek assistance from the Employee Assistance Program.

2. Records of Reports

All reports of fraud or corruption are recorded on the Fraud and Corruption Incident Register for each entity within the Portfolio, which is maintained by Legal Services and Integrity, Authority Chief Operating Officer (COO), Agency Secretary and Governance Manager. These registers are updated regularly to reflect the outcome of investigations into each incident.

Legal Services and Integrity prepares a report for the SERBIR for EPSDD's Audit Committee on allegations of fraud and/or corruption and their assessments and investigations. A summary of each incident is also recorded in Annual Reports.

The City Renewal Authority COO and Suburban Land Agency Secretary and Corporate Area provide reports to their respective Audit and Risk Committees and Boards and include summaries of each incident in their Annual Reports.

Monitoring and Review

The Director-General's/CEOs' Financial Instructions, and all delegations and other authorisations must be reviewed at least annually (or as required) to ensure they remain appropriate to business needs and are being used appropriately.

As the Portfolio's functions change and evolve, new systems, processes and contracting arrangements are introduced or modified then the risk of possible fraud or corruption increases. Every change presents the possibility of new or altered business risks and every change must therefore be subjected to the risk assessment process. This includes an assessment of any change in fraud and corruption risks and addressing fresh or revised measures to control or management those risks.

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The SERBIR (for EPSDD), Authority COO (for the City Renewal Authority) and Agency Secretary and Governance Manager (for the Suburban Land Agency) will provide reports as required to their respective audit committees on the implementation of the Plan. In addition, the respective audit committee may initiate audits designed to measure or monitor the implementation of the Plan or associated aspects of fraud and corruption.

The Plan must be reviewed at least once every two years, including undertaking a fraud and corruption risk assessment.

Records Management

Documents created or used during the management of an alleged fraud or corruption incident will be stored in an electronic document and records management system (EDRMS) in accordance with the *Territory Records Act 2002*. Access to relevant files should be restricted in accordance with the relevant permissions policy. Personal information will be collected, used and disclosed in accordance with the *Information Privacy Act 2014* and the Information Privacy Policy.

Data and statistics, with personal information removed, may be generated to assist with reporting on the management of allegations of fraud and corruption and their investigations.

Evaluation

Outcome Measures What will be measured to determine achievement - has the plan purpose occurred?	Method How will this be done?	Responsibility Who is responsible for evaluation?
Staff are aware of fraud and corruption risks and how to identify potential instances of fraud and corruption and how to report	All staff survey Attendance at 'Fraud and Ethics' and 'Integrity' training sessions Undertaking eLearning on MyLearning, which includes an assessment of the participants' knowledge and understanding of fraud, corruption and ethics Executives and managers regularly and actively addressing fraud and corruption prevention in business units	Legal Services and Integrity People and Capability

Outcome Measures What will be measured to determine achievement - has the plan purpose occurred?	Method How will this be done?	Responsibility Who is responsible for evaluation?
Staff are aware of Fraud and Corruption Prevention Plan	All staff survey All staff emails Accessible on intranet Attendance at 'Fraud and Ethics' and Integrity training sessions. Undertaking eLearning on MyLearning, which includes an assessment of the participant's knowledge and understanding of fraud, corruption and ethics. Executives and managers promote the Plan	Legal Services and Integrity SERBIR

Related Documents

- ACT Integrity Policy 2010
- Portfolio Integrity Framework (under development)
- SERBIR Roles and Responsibilities
- Conflict of Interest Factsheet
- Conflict of Interest - Land Purchase from City Renewal Authority and Suburban Land Agency, including from a Territory Joint Venture or under a Territory Sponsored Program
- *Public Interest Disclosure Act 2012*
- *Public Interest Disclosure Guidelines 2019*
- *Information Privacy Act 2014*
- The Portfolio's Information Privacy Policies and Annexes
- *Public Sector Management Act 1994*
- *ACTPS Values and Signature Behaviours*
- *ACTPS Code of Conduct*
- ACT Public Service Enterprise Agreements
- Human Resources Delegations
- Gifts and Hospitality Policies

- Director-General's/CEOs' Financial Instructions
- ACT Government - Acceptable Use of ICT Resources Policy

Version history

Version	Date	Amendment details
0.1	08/07/2019	Draft policy
1.0	24/10/2019	Endorsed policy

Attachment A

Roles and Responsibilities for the Environment, Planning and Sustainable Development Directorate

Role or Position or Business Area	Responsibility
Director-General	• Foster and develop the highest standards of ethical behaviour • Ensure adequate fraud and corruption controls are in place • Ensure the wide dissemination of the Plan • Ensure that all staff undertake regular training in fraud and corruption awareness and ethics and the *ACTPS Code of Conduct* • Ensure procedures are in place for the detection, investigation and prosecution of offences should they occur • Appoint a Senior Executive Responsible for Business Integrity and Risk (SERBIR) • Appoint Disclosure Officers
Deputy Directors-General	• Foster and develop within EPSDD the highest standards of ethical behaviour • Assist the Director-General, audit committee, and the SERBIR in fulfilling their responsibilities arising from the Plan • Promote a sound knowledge of the Plan, including that staff attend awareness sessions

Role or Position or Business Area	Responsibility
	• Act as a point of contact for staff reporting fraud or corruption matters, and referring the allegations to the SERBIR.
Executives	• Foster and develop the highest standards of ethical behaviour • Assist the Director-General, Deputy Directors-General, Audit Committee, and the SERBIR in fulfilling their responsibilities arising from the Plan • Promote a sound knowledge of the Plan, including that staff attend awareness sessions • Act as a point of contact for staff reporting fraud or corruption matters, and referring the allegations to the SERBIR • Ensure business unit risk assessments are undertaken, including consideration of fraud and corruption risks • Review effectiveness of fraud and corruption prevention measures following significant functional or structural changes
Executive Branch Manager, Governance, Compliance and Legal Services	• Manage the development, maintenance and implementation of policies, procedures and advice on fraud and corruption prevention and control
Audit Committee	• Provide oversight of risk management processes enabling effective identification of possible business and financial risks, including fraud and corruption. • Review processes and procedures through the internal audit program
Senior Director, Legal Services and Integrity	• Assist and support the DG, CEOs and SERBIR in fulfilling their responsibilities • For EPSDD, record all allegations of fraud and corruption which occur and advise the SERBIR • Prepare and deliver training and materials on fraud and corruption prevention • Provide advice to staff on fraud and corruption prevention
Security Executive, Officer and Adviser	• Assist in the identification of potential evidence, such as building access logs and CCTV footage

Role or Position or Business Area	Responsibility
Legal Services and Integrity	• Assist and support the DG, CEOs and SERBIR in fulfilling their responsibilities • Provide advice to staff on fraud and corruption prevention

Roles and Responsibilities for the City Renewal Authority

Role or Position or Business Area	Responsibility
City Renewal Authority Board	• Approve the Authority's risk management policies and frameworks, including the Fraud and Corruption Prevention Plan • Ensure the efficient and effective financial management of the resources for which the Authority is responsible (including ensuring expenses occurred by the authority are properly authorised).
Chief Executive Officer	• Foster and develop the highest standards of ethical behaviour • Ensure adequate fraud and corruption controls are in place • Ensure the wide dissemination of the Plan • Ensure that all staff undertake regular training in fraud and corruption awareness and ethics and the *ACTPS Code of Conduct* • Ensure procedures are in place for the detection, investigation and prosecution of offences should they occur • Appoint Senior Executive Responsible for Business Integrity and Risk (SERBIR) • Regularly advise the City Renewal Authority Board about the operation and financial performance of the Authority • Appoint Disclosure Officers.
Executives	• Foster and develop the highest standards of ethical behaviour • Assist the CEO, Audit and Risk Committee, and the SERBIR in fulfilling their responsibilities arising from the Plan • Promote a sound knowledge of the Plan, including that staff attend awareness sessions

Role or Position or Business Area	Responsibility
	• Act as a point of contact for staff reporting fraud or corruption matters, and referring the allegations to the SERBIR • Ensure business unit risk assessments are undertaken, including consideration of fraud and corruption risks • Review effectiveness of fraud and corruption prevention measures following significant functional or structural changes
Chief Operating Officer	• Ensure that Risk Register reflect fraud and corruption risks and are regularly reviewed and updated • Report to the CEO, Audit and Risk Committee, and the Board on the implementation of the Plan • Monitor the Plan's implementation and coordinate any risk treatments • Assist and support the CEO and SERBIR in fulfilling their responsibilities • Record all allegations of fraud and corruption which occur and advise the SERBIR
Audit and Risk Committee	• Ensure a risk management framework is established, implemented and maintained in accordance with ACT Government requirements • Provide oversight of risk management processes enabling effective identification of possible business and financial risks, including fraud and corruption • Monitor a register of audit recommendations, including those relating the fraud and corruption prevention measures • Review processes and procedures through the internal audit program.

Roles and Responsibilities for the Suburban Land Agency

Role or Position or Business Area	Responsibility
Suburban Land Agency Board	• Review and approve Agency's relevant policies and procedures, including the Fraud and Corruption Prevention Plan • Ensure the efficient and effective financial management of the resources for which the Agency is responsible
Chief Executive Officer	• Foster and develop the highest standards of ethical behaviour • Ensure adequate fraud and corruption controls are in place • Ensure the wide dissemination of the Plan • Ensure that all staff undertake regular training in fraud and corruption awareness and ethics and the *ACTPS Code of Conduct* • Ensure procedures are in place for the detection, investigation and prosecution of offences should they occur • Appoint Senior Executive Responsible for Business Integrity and Risk (SERBIR) • Appoint Disclosure Officers
Executives	• Foster and develop the highest standards of ethical behaviour • Assist the CEO, Agency Board, Audit and Risk Committee, and the SERBIR in fulfilling their responsibilities arising from the Plan • Promote a sound knowledge of the Plan, including that staff attend awareness sessions • Act as a point of contact for staff reporting fraud or corruption matters, and referring the allegations to the SERBIR • Ensure business unit risk assessments are undertaken, including consideration of fraud and corruption risks

Role or Position or Business Area	Responsibility
	• Review effectiveness of fraud and corruption prevention measures following significant functional or structural changes.
Agency Secretary and Governance Manager	• Ensure that Risk Register reflect fraud and corruption risks and are regularly reviewed and updated • Report to the CEO, Agency Board, Audit and Risk Committee, and the Board on the implementation of the Plan • Monitor the Plan's implementation and coordinate any risk treatments • Assist and support the CEO and SERBIR in fulfilling their responsibilities • Record all allegations of fraud and corruption which occur and advise the SERBIR
Board Audit and Risk Committee	• Provide oversight of risk management processes enabling effective identification of possible business and financial risks, including fraud and corruption • Conduct annual review of the Fraud and Corruption Control Plan for the Agency • Review processes and procedures through the internal audit program