

Policy – Fraud Prevention

Policy

The Corporation does not tolerate improper conduct by employees or contractors.

Staff are expected to act at all times in the best interest of the Corporation and should conduct all dealings with integrity and fairness.

All staff across the Corporation are responsible for the prevention and detection of fraud.

Definitions

Improper conduct

Includes fraud, and the following types of conduct which, if proved, would be a criminal offence or provide reasonable grounds for dismissal.

- adversely affecting the honest performance by a public officer/official of their functions;
- dishonest performance of public functions;
- knowingly or recklessly breaching public trust;
- misuse of information obtained in an official capacity;
- conspiracy or attempt to commit the above conduct;
- substantial mismanagement of public resources; or
- substantial risk to public health or safety or to the environment.

Fraud

Dishonestly obtaining a benefit by deception or other means

Bribe

A bribe is an offer of money or other inducement that is made with an intention to corruptly influence the performance of an employees duties. Bribery or attempted bribery of a public official is a criminal offence

Strategies

The Corporation will adopt appropriate, cost-effective controls and procedures to prevent, detect, deter and deal with fraud.

A financial code of practice will be maintained to set the standard of financial conduct expected from staff.

SRW will conduct regular reviews of its systems of internal control. All adverse findings will be reported to the Managing Director and the Audit, Risk and Governance Committee.

SRW will undertake an internal audit program. All findings will be reported to

the Managing Director and the Audit, Risk and Governance Committee.

A compliance program will be maintained to assess the effectiveness, and currency of internal financial controls. It will be reviewed annually and findings reported back to the Managing Director and Audit, Risk and Governance Committee.

A fraud risk profile will be established for the Corporation. This will include the completion of a fraud risk assessment.

Personnel policies and induction procedures will ensure that all employees;

- are kept informed of this policy; and.
- will be made aware of the Victorian Code of Conduct for Victorian Public Sector Employees issued by State Government

Reporting

All SRW employees must report improper conduct to the Independent Broad-based Anti-corruption Commission (IBAC).

If SRW is contacted by a person who alleges that improper conduct is occurring, has occurred, or is about to occur, the person must be immediately redirected to IBAC.

Reports will be received in confidence by IBAC as a Protected Disclosures in accordance with the *Protected Disclosure Act 2012*.

SRW notification

Subject to limitations imposed by the *Protected Disclosure Act 2012*:

- All cases of suspected or actual theft, irregularity or fraud must be notified to the Minister of Finance, the responsible Minister and the Auditor-General:
 - Immediately where more than \$1,000 of money or more than \$20,000 of property is mis-appropriated; or
 - Annually for the period ending 30 June for all other losses.
- The Managing Director shall immediately report to the board any issues or incidents identified in regard to this policy.

Employees must contact IBAC if they are unsure of any obligations or requirements created by the *Protected Disclosure Act 2012*.

Investigation and disciplinary matters

Responsibility for ensuring that appropriate investigations are undertaken rests with IBAC.

SRW employees are required to assist with any investigations undertaken.

Incidents of fraud and suspected fraud will result in consequences consistent with SRW Disciplinary procedures.

The Corporation will pursue recovery of any financial loss through civil proceedings. Only the Managing Director and/or the SRW board can vary this arrangements.

Effective date and review date

This Policy replaces and updates the Fraud Prevention Policy adopted at meeting 133 on 16 June 2005.

This policy takes effect on 2 February 2016.

It is due for review by February 2019.

Who is affected

This policy applies to all SRW staff.

Rationale

A fraudulent incident will result in financial loss and reputational damage to SRW.

This policy is designed to minimize the risk of fraud.

Contact

For more information on this policy, contact the Chief Financial Officer.

Related documents

- *Financial Management Act 1994*
 - Standing Directions from the Minister of Finance
 - Integrity complaints, Guidance note for boards of DELWP agencies, IBAC
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Communications

This policy will be made available on SRW's website.
