



Southern Rural Water Policy – Fraud and Corruption Control Policy

Policy

Southern Rural Water (SRW) does not tolerate fraud and corruption by employees or other workplace participants, nor any reprisals against those who come forward to disclose such conduct.

This Policy outlines SRW's expectations for effective fraud and corruption control consistent with SRW's Fraud and Corruption Control Framework.

- Fraud and corruption are taken seriously at SRW, with zero tolerance of fraudulent activity or corrupt conduct.
- Employees and other workplace participants must abide by the Code of Conduct for Victorian Public Sector Employees and must not engage in fraud or corruption.
- Employees and other workplace participants who suspect or have knowledge of fraudulent activity or corrupt conduct have an obligation to immediately report the matter to the Managing Director. (or the Chair of the Board if the activity involves the Managing Director)
- Public Interest Disclosures can also be reported directly to the Independent Broad-based Anti-corruption Commission (IBAC).
- Disclosures of fraud or corruption may attract protections under the Public Interest Disclosures Act 2012.
- No employee or other workplace participant is to examine a case or seek evidence about fraud or corruption, other than those authorised to undertake investigations.
- Investigations and notifications will be coordinated as required by SRW staff that are authorised to undertake investigations, IBAC, Victoria Police and/or any other relevant parties that are authorised to undertake investigations.
- All suspected fraudulent or corrupt activities will be investigated and may attract criminal, civil, administrative, or disciplinary sanctions.
- SRW has appropriate strategies and resources in place to manage its fraud and corruption risks as outlined in the Fraud and Corruption Control Framework (the Framework).
- SRW will undertake a fraud risk assessment at least every three years as part of a triennial review of the Framework to ensure that appropriate mitigation actions are in place.

Reporting

In addition to the IBAC reporting requirements, the Managing Director under Standing Direction 3.5.3 is required to inform the Responsible Minister, the Audit, Risk & Governance Committee, DEECA, and the Auditor General of a significant or systematic fraud or corruption incident (\$>5k cash or \$>50k property) and any remedial action to be taken.

In the circumstance the incident involves the Managing Director, the Board Chair assumes the reporting requirements.

The Corporation Secretary is responsible for ensuring reporting of all non-material claims of suspected fraud and corrupt activity is reported to the Audit, Risk and Governance Committee.

Definitions	<p>Fraud is dishonest activity causing actual or potential gain or loss to any person or organisation (including theft of money or other property) by employees or persons external to the organisation, and/or where deception is used at the time, immediately before or immediately following the activity.</p> <p>Fraud 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 benefit.</p> <p>Corruption is the misuse of public power or position. It includes where a public officer abuses their position of trust to achieve personal advantage or advantage for another person or organisation and acts contrary to the interests of the organisation.</p> <p>Corruption also occurs where a person adversely affects the honest performance of a public officer or public body in the exercise of public functions or powers. For example the manipulation of documents for a permit application may lead to unfair selection.</p> <p>Corruption constitutes or involves knowingly or recklessly breaching public trust</p>
Effective date and review date	This policy takes effect on 5 December 2023. It is due for review in 2026
Who is affected	It applies to all employees and other workplace participants, including (but not limited to) directors, trainees, work experience students, consultants and contractors.
Contact	For more information on this policy, contact the Corporation Secretary
Related documents	<ul style="list-style-type: none"> • Independent Broad-based Anti-corruption Commission Act 2011 • Financial Management Act 1994 • Public Administration Act 2004 • Public Interest Disclosures Act 2012 • SRW Fraud and Corruption Control Framework • SRW Staff Behaviour Policy, • SRW Gifts, Benefits & Hospitality Policy • SRW Conflicts of Interest Policy • SRW Public Interest Disclosure Policy • SRW C.I. 1.14: Discipline and Performance Management • Code of Conduct for Victorian Public Sector Employees • Code of Conduct for Victorian Public Sector Directors
Communications	This policy will be made available on SRW's intranet and website.