



northern
beaches
council

ATTACHMENT BOOKLET

NORTHERN BEACHES COUNCIL

TUESDAY 26 MARCH 2024

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Council Policy – No 97	Adopted:	OM: 03.03.1997
	Reviewed:	
	Amended:	OM: 17.10.2011 OM: 04.11.2013
	Revoked	

TITLE: PUBLIC COLLECTIONS/APPEALS

STRATEGY: BUILDING COMMUNITIES
TOWN & VILLAGE

BUSINESS UNIT: RESERVES, RECREATION & BUILDING SERVICES

RELEVANT LEGISLATION: LOCAL GOVERNMENT ACT 1993, ROADS ACT 1993

RELATED POLICIES: NONE

Objective

That pursuant to the Local Government Act, 1993, Council determines that the following restrictions and conditions shall apply to public collections: collections to include "soliciting or collecting in any public road or from house to house adjacent to any public road, gifts of money, or of subscriptions for any purpose". A permit must be obtained from the Council by any person or association which proposes to undertake collection within the Pittwater Area.

Policy Statement

1. Only one "Door Knock Appeal" per year shall be permitted for each registered charity.
2. No action be taken by Council to limit or restrict payment to collectors by registered charities.
3. All applicants are to provide a letter of authority to fundraise from the organisation or charity on behalf of whom they are collecting.
4. Council will not approve "Traffic Light Appeals" due to safety issues.
5. That in the case of "Stalls in Commercial Centres", an applicant needs to lodge the appropriate application form. Registered charities shall be restricted to a maximum of two stalls, each with a maximum of 4 days, in each commercial centre per month, providing that there must be two weeks between each booking. Bookings for charities and not for profit organisations can only be made in advance for each quarter.

6. That where any person or association is found to be in breach of this policy, the following procedure shall apply:
 - (i) The person or association will be advised of the procedure for street stalls in which they need a permit prior to undertaking of the activity.
 - (ii) Failure to comply with any or all conditions of approval set by the Reserves and Recreation Officer may result in an infringement notice being issued.



Council Policy **NB-P-XX** Enterprise Risk and Opportunity Management

BackgroundPurpose

The purpose of the policy is to affirm Council's commitment to:

- using risk management as a tool to effectively manage risk and assess opportunities as an integral part of planning and decision making and in the pursuit of our organisational objectives
- manage identified risks and actively monitor the risk environment
- establish clear guidelines to ensure that councillors and staff at all levels are aware of potential risks and of their individual responsibility for the effective management of those risks.

Policy StatementPrinciples

Council recognises the importance of risk management to strengthen its capacity to effectively identify, understand and capitalise on challenges and pursue opportunities.

Council recognises that unmitigated risks can adversely impact its ability to achieve strategic and operational objectives. Accordingly, Council is committed to a holistic, consistent and systematic approach to risk management to ensure that risks are identified, fully understood, adequately communicated, monitored and effective controls put in place to manage risks. Council adopts the approach that risk management must be aligned to a strong internal control environment.

Council's approach to Enterprise Risk and Opportunity Management (EROM) is consistent with the *Australian/New Zealand Risk Management Standard: AS/NZS ISO 31000:2018*; ~~and aligns with COSO Enterprise Risk Management—Strategy and Performance (2017) and COSO Internal Control—Integrated Framework (2013)~~, and the directions under the Local Government Act 1993 ~~and the Office of Local Government's Risk Management and Internal Audit Framework~~ Local Government (General) Regulation 2021.

Principles

The guiding principles of this policy are:

- to promote sound decision making using the EROM Framework to ensure Council advances with increased confidence towards the achievement of our objectives
- to promote good governance by demonstrating transparent, accountable and responsible risk management processes aligned with accepted best practice standards and methods
- to promote a risk aware culture where all councillors and all staff assume accountability for managing risks
- to effectively integrate risk management into Council's executive planning activities to ensure the achievement of strategic objectives as identified in the Community Strategic Plan and related strategies and plans
- to embed a framework which provides staff with necessary tools to manage risks
- to provide an innovative, flexible and resilient framework through continuous refinement to ensure the consistent management and/or mitigation of risks which may impact on Council
- to provide an environment of greater certainty and confidence for councillors and Council staff, for our stakeholders and for our community about Council's ability to make sound decisions.



Risk Appetite Acknowledgement

Council acknowledges that at times it must undertake activities that inherently carry greater risks in pursuit of its vision and strategic objectives. This will necessitate that Council may accept risks that:

- facilitate change and improvement opportunities
- generate additional sources of income, improve efficiency and seek savings
- maintain and/or improve levels of services to the community
- are proportionate with the potential reward.

Council recognises that its acceptance of risk will always be subject to ensuring that potential benefits and risks are fully understood and that sensible measures to manage the risks are established. Council, senior management and staff will have regard for Council's stated risk appetite as detailed in the Risk Appetite Statement for both strategic and operational decision making.

Scope and Application

Senior Management will be responsible for creating an environment where staff assume responsibility for consistent risk management practices as part of their everyday activities and decision making. Appropriate training and resources will be made available to assist staff in identifying, assessing and responding to risks.

The following is a broad overview of the roles and responsibilities for the management of risk within Council. Full roles and responsibilities are outlined in the EROM Framework.

Council is ultimately responsible for adopting and committing to the EROM Policy, monitoring the strategic risk environment and considering risk management issues affecting strategic and Council decisions.

Senior management is responsible for ensuring the EROM Policy and Framework- are effectively implemented and monitored within their areas of responsibility.

All staff are responsible for adequately considering risks associated with decisions they make and to ensure they consistently apply the EROM Framework.

Audit, Risk and Improvement Committee is responsible for oversight of risk management in accordance with the Audit Risk and Improvement Committee Charter.

Application

~~Senior Management will be responsible for creating an environment where staff assume responsibility for consistent risk management practices as part of their everyday activities and decision making. Appropriate training and resources will be made available to assist staff in identifying, assessing and responding to risks.~~

References and Related Documents

This policy provides the over-arching commitment to Council's EROM Framework. It is supported by Council's:

- Audit Risk and Improvement Committee Charter



- Business Continuity Sub-Plans
- Enterprise Risk and Opportunity Management Framework
- Fraud and Corruption Control Plan
- Risk Appetite Statement
- Risk and Opportunity Management Assessment Guidelines
- Strategic, operational, ~~functional~~ and initiative-based risk registers.

Legislation and Other Guidance

- Australian Standard AS/NZS ISO 31000:2018 Risk Management Principles and Guidelines
- ~~COSO Internal Control – Integrated Framework (2013)~~
- ~~COSO Enterprise Risk Management – Integrating with Strategy and Performance (2017)~~
- Local Government Act 1993 (NSW)
- Local Government (General) Regulation 202105
- Office of Local Government (~~DRAFT~~) Risk Management and Internal Audit Guidelines for Local Government Internal Audit and Risk Management Framework.

Definitions

~~Residual risk: the remaining level of risk after risk treatment measures have been taken into account~~

Risk: the effect of uncertainty on objectives, where this effect can be positive or negative

~~Risk control~~*Control:* the policies, strategies, processes and procedures or other internal controls, and tasks or physical changes to eliminate or minimise risks

Risk acceptance: an informed decision to accept the likelihood of a particular risk and its consequences

Risk appetite: the level of risk that an organisation is prepared to accept before mitigation action is deemed to be necessary

Risk assessment: the overall process of risk analysis and risk evaluation

Risk management: the culture, processes and structures that are directed towards the effective management of potential opportunities and adverse effects

~~Risk tolerance: the readiness to bear the risk (after risk treatment) in order to achieve objectives~~

~~Risk treatment: Selection and implementation of appropriate options for dealing with risk~~

Senior management: refers to the CEO, Directors Executive Managers.

Community Strategic Plan

This Council policy relates to the Community Strategic Plan Outcome of:

- Good governance - Goal 19 Our Council is transparent and trusted to make decisions that reflect the values of the community



Responsible Officer

Executive Manager Governance and Risk

Review Date

The next review is due (insert date 4 years from Council adoption) in November 20222026.

Revision History

Revision	Date	Status	TRIM Ref
1	25/7/2017	Policy adopted by Council with no changes following exhibition	2017/136547
2	27/11/2018	Revised policy adopted by Council with minor amendments to ensure currency of policy	2017/136547
3	24/11/2020	Revised policy adopted by Council with minor amendments to ensure currency of policy	2017/300338
<u>4</u>	<u>March 2024</u>	<u>Revised policy for Council consideration with minor amendments to ensure currency of policy</u>	<u>2024/140496</u>

Council Policy NB-P-XX (numbering provided by Governance) **Fraud and Corruption Control Policy**

Purpose

This policy sets standards and provides guidance on how to control fraud and corruption at Northern Beaches Council (Council) and is based on the Independent Commission Against Corruption's Sample Fraud and Corruption Control Policy.

Policy Principles

Council is committed to minimising fraud and corruption in the workplace. To achieve this, Council has adopted and resourced a fraud and corruption control framework that aligns to better practice.

The public, our staff and other people we deal with are entitled to expect each of us to act with integrity and to protect resources, information, revenues, reputation and the public interest.

Council is committed to an honest and ethical environment that minimises fraud and corruption. Fraud and corruption are incompatible with our values and present a risk to the achievement of our objectives and the provision of our services to the public.

Council has a zero-tolerance approach to fraud and corruption.

Fraud and corruption control framework

Council has an agency-wide fraud and corruption control framework that is consistent with the NSW *Fraud and Corruption Control Policy* (Treasury Circular 18-02). Council's fraud and corruption control framework includes this Policy and the documents listed below under the heading "References and Related Documents". It is the policy of Council to:

- align to better practice advice issued by organisations such as the NSW Independent Commission Against Corruption, the NSW Ombudsman and Audit Office of NSW and takes account of the Audit Office NSW Fraud Control Improvement Kit 2015 and the Australian Standard for Fraud and Corruption Control 2021 (AS8001-2021)
- as part of its framework, implement internal controls that prevent, detect and respond to fraud and corruption, as detailed in Council's Fraud and Corruption Control Plan
- assess its fraud and corruption risks every year
- ensure all staff, including contractors, are aware of relevant fraud and corruption risks and are trained to understand Council's values, codes, policies and expectations of behaviour
- report annually to the Audit, Risk and Improvement Committee on the status of the fraud and corruption control framework and risks (including compliance with this Policy)
- treat all complaints about, and instances of, fraud and corruption seriously. Council will cooperate with all relevant investigative and regulatory bodies and will take fair, proportionate disciplinary action against any employee or third party found to have engaged in fraud or corruption.

Key roles and responsibilities

In addition to the responsibilities of all staff and managers set out below, the following officers and groups have key roles in relation to controlling fraud and corruption.

- The CEO (along with the Chief Executive Team and the Executive Leadership Team) is responsible for ensuring that an agency-wide fraud and corruption control framework is in place, modelling the highest standards of ethical behaviour and ensuring compliance with all relevant legal obligations.
- Executive Manager Internal Audit and Complaints Resolution is the owner of this policy and is responsible (with the assistance of Governance and General Counsel) for coordinating and documenting Council's overall fraud and corruption control framework.
- Information and Digital Technology is responsible for coordinating with other fraud and risk functions to manage technology-enabled fraud.
- The Audit, Risk and Improvement Committee provides advice to the CEO about this policy and monitoring the fraud and corruption control framework.
- Executives and People leaders are responsible for taking a leadership role in promoting and sustaining ethical behaviour and culture.
- All level 5 Managers and above are responsible for receiving public interest disclosures, and the Complaints Resolution Team is responsible for investigating a disclosure.
- The Fraud and Corruption Control Committee is responsible for overseeing management of fraud and corruption complaints, and reporting quarterly to ARIC on the status of fraud and corruption complaints management and controls.

Requirements of employees and managers

In addition to complying with all integrity-related policies including the Code of Conduct, employees are expected to cooperate with all initiatives aimed at preventing, detecting, and responding to fraud and corruption. This includes risk assessments, training and education, audits and investigations and the design and implementation of controls.

Managers are also expected to:

- ensure all agreed controls aimed at preventing, detecting and responding to fraud and corruption are in place
- alert the policy owner of any undocumented or emerging fraud and corruption risks
- ensure suppliers and contractors are aware of Council's policies and expectations in relation to fraud and corruption
- ensure all staff complete relevant training and are aware of fraud and corruption risks.

Reporting breaches

Any breaches of this Policy are managed under the Code of Conduct, Statement of Business Ethics or other related policies, as listed below.

What is fraud and corruption?

Fraud refers to dishonestly obtaining a benefit, or causing a loss, by deception or other means. In broad terms, corruption is deliberate, serious wrongdoing that involves dishonest or partial conduct, a breach of public trust or the misuse of information or material. A more detailed definition is found in sections 7, 8 and 9 of the *Independent Commission Against Corruption Act 1988*.

Scope and Application

This policy applies to all staff, councillors, volunteers, consultants, contractors (and employees of) working for or on behalf of Council, outsourced service providers performing work for Council, and committee and panel members.

References and Related Documents

- The Northern Beaches Council Code of Conduct
- Public Interest Disclosure Policy
- Managing Unsatisfactory Conduct Policy and Procedure
- Complaints Management Policy
- Statement of Business Ethics
- Fraud and Corruption Control Plan

Community Strategic Plan

This Council policy relates to the Community Strategic Plan Outcome of

- Good governance - Goal 19 Our Council is transparent and trusted to make decisions that reflect the values of the community

Responsible Officer

Executive Manager Internal Audit and Complaints Resolution

Review Date

Insert date four years from Council adoption (review once per Council term).

Revision History

Policy number	Date	Detail	TRIM #
	19 December 2019	Adopted by Council	2019/411482
Allocated by Governance	March 2024	Revised draft for Council consideration	Insert trim ref



Council Policy

Fraud and Corruption Control

Policy Statement

The purpose of this policy is to articulate Council's commitment to maintaining trust and building advocacy with the community and its stakeholders through a robust and vigilant fraud and corruption prevention approach.

The Northern Beaches community expects public officials to deliver services with integrity and in the best interests of the public. Fraudulent and corrupt conduct by a public official can result in significant resource costs to Council. It also puts at risk the reputation of all staff, Councillors and delegates and undermines trust with the community.

Accordingly, Northern Beaches Council has a zero-tolerance position on any fraudulent or corrupt behaviour and will act swiftly and decisively through relevant policies, legal or legislative mechanisms to deal with those who engage in, attempt to obscure or in any way participate in or encourage this behaviour.

Council is committed to establishing a framework to prevent fraud and corruption, proactively monitor, maintain and build awareness of its fraud and corruption prevention controls and strategies.

Principles

1. That Council implements a fraud and corruption control plan which is aligned to:
 - a. the NSW Independent Commission Against Corruption Act 1988
 - b. which follows leading practice guidelines for the establishment and maintenance of a Fraud Control Framework set out in the NSW Audit Office's Fraud Control Improvement Kit 2015.
2. That Council will make available the resources to fund the successful implementation of the fraud and corruption control plan.
3. That Council reports fraud and corruption statistics to relevant stakeholders.

Scope and Application

This policy applies to all council officials, ie:

- all council staff and councillors
- permanent employees, whether full-time or part-time
- temporary or casual employees
- all contractors working for or on behalf of Council
- employees of contractors providing services to or on behalf of Council
- other people who perform council official functions, including volunteers and committee and panel members.



References and related documents

- Independent Commission Against Corruption Act 1988 NSW
- Local Government Act 1993 NSW
- NSW Audit Office Fraud Control Policy (August 2018)
- NSW Audit Office’s Fraud Control Improvement Kit (February 2015)
- Northern Beaches Council Code of Conduct
- Northern Beaches Council Public Interest Disclosure Internal Reporting Policy
- Council values.

Definitions

Contractors: Individuals or entities who perform a task or provide a service to or on behalf of Council, whether or not they are bound by a written contract to do so

Council: Northern Beaches Council

Corrupt conduct: This policy uses the same definition as stated in the Independent Commission Against Corruption Act 1988 NSW.

Fraud: Deliberate and premeditated activity which involves the use of deception to gain advantage and/or obtain a financial benefit to the detriment of the Council

Public official: a public official is taken to be a public official as defined under the Independent Commission Against Corruption Act 1988 NSW and includes an employee (including contractors, temporary and casual staff) of Northern Beaches Council, any individual that undertakes an official public function on behalf of Northern Beaches Council, and Council committee members.

Responsible Officer

Executive Manager Governance and Risk

Review Date

December 2021

Version

Version	Date	Change	TRIM Ref
1	December 2019	Adopted by Council 19 December 2019	2019/411482

Sample fraud and corruption control policy

This document is a sample fraud and corruption control policy that can be used by NSW public sector agencies to help them develop or refine their own policies. It is general in nature and does not address the specific circumstances with which agencies are faced. As such, agencies should adapt the material to suit their own policy-writing conventions and situations.

The explanatory notes (shaded below) are intended to be typed over or guide staff who are developing their policy documents.

Updated January 2021

[Agency name] Fraud and Corruption Control Policy

1. Overview

Objectives

This policy sets standards and provides guidance on how to control fraud and corruption.

Some agencies may prefer to refer to their policy as an Anti-Fraud, Anti-Corruption Policy or some variation thereof. If an agency prefers a different title it may choose to use terms such as anti-fraud and anti-corruption instead of fraud and corruption control.

Message from [Agency head]

The public, our fellow employees and other people we deal with are entitled to expect each of us to act with integrity and to protect resources, information, revenues, reputation and the public interest. Therefore, [Agency name] is committed to an honest and ethical environment that minimises fraud and corruption. Fraud and corruption are incompatible with our values and present a risk to the achievement of our objectives and the provision of our services to the public. [Agency name] has a zero-tolerance approach to fraud and corruption.

It is recommended that agencies include an opening statement from their agency head. This should succinctly describe a broad, zero-tolerance attitude towards fraud and corruption. If necessary, it should reference the agency's existing values.

Scope

This policy applies to all staff, volunteers, consultants, contractors and outsourced service providers performing work for [Agency name].

Agencies may require contractors to comply with the fraud and corruption control policy; however, agencies should adjust the scope based on their approach, contractual terms and conditions, and other policies.

What is fraud and corruption?

Fraud refers to dishonestly obtaining a benefit, or causing a loss, by deception or other means. In broad terms, corruption is deliberate, serious wrongdoing that involves dishonest or partial conduct, a breach of public trust or the misuse of information or material. A more detailed definition is found in s 7, s 8 and s 9 of the *Independent Commission Against Corruption Act 1988*. *[Alternatively, an appendix could be added to the policy that sets out the full definition of corrupt conduct]*

Some examples of fraud and corruption that could affect *[Agency name]* include:

- *[#####]*
- *[#####]*
- *[#####]*

It is recommended that the agency set out a small number of examples that relate specifically to its operations. These could be based on past incidents or the known risk profile.

This policy applies to fraud and corruption against *[Agency name]* as well as fraudulent or corrupt conduct by its staff.

Policy in brief

[Agency name] is committed to minimising fraud and corruption in the workplace. To achieve this, *[Agency name]* will adopt and resource a fraud and corruption control framework that aligns to better practice.

2. Policy in detail

Approach

[Agency name] will adopt an agency-wide fraud and corruption control framework that is consistent with the NSW *Fraud and Corruption Control Policy* (Treasury Circular 18-02). In particular, it is also the policy of *[Agency name]* to:

- as part of its framework, implement internal controls that prevent, detect and respond to fraud and corruption
- assess its fraud and corruption risks at least every two years
- ensure all staff, including contractors, are aware of relevant fraud and corruption risks and are trained to understand [Agency names]'s values, codes, policies and expectations of behaviour
- report annually to the Audit and Risk Committee on the status of the fraud and corruption control framework
- treat all complaints about, and instances of, fraud and corruption seriously. [Agency name] will cooperate with all relevant investigative and regulatory bodies and will take fair, proportionate disciplinary action against any employee or third party found to have engaged in fraud or corruption
- wherever practical, align to better practice advice issued by organisations such as the NSW Independent Commission Against Corruption, the NSW Ombudsman and Audit Office of NSW
- [Add further policy statements as required].

Key roles and responsibilities

In addition to the responsibilities of all staff and managers set out below, the following officers and groups have key roles in relation to controlling fraud and corruption.

[The policy should allocate some key roles. The text below is illustrative and should be revised as required. The roles should address the prevention, detection and investigation of fraud/corruption.]

- The [Agency head] is responsible for ensuring that an agency-wide fraud and corruption control framework is in place, modelling the highest standards of ethical behaviour and ensuring compliance with all relevant legal obligations.
- [#####] is the owner of this policy and is responsible for coordinating and documenting [Agency name]'s overall fraud and corruption control framework. *[Larger agencies tend to have an officer or even a unit responsible for overall management of fraud and corruption risk. But even if the agency does not have a FTE position dedicated to fraud and corruption control, it is*

recommended that the policy owner also coordinate the agency's overall control efforts]

- The Audit and Risk Committee is responsible for giving advice to the [Agency head] about this policy and monitoring the fraud and corruption control framework. *[Note – this should also be reflected in the ARC's charter]*
- The chief audit executive is responsible for ###.
- The chief risk officer is responsible for ###.
- Legal counsel is responsible for ###.
- The [head of HR] is responsible for ###.
- *[The heads of audit, risk, legal and HR typically have roles but insert further roles as required. This might include staff with responsibility for: accepting and managing public interest disclosures; professional standards; IT security; insurance; learning and development; procurement; finance/accounting; privacy; the Government Information (Public Access) Act 2009; and physical security. Alternatively, this level of detail could be in a separate fraud and corruption control plan.]*

In addition, if your agency has created a committee tasked with managing fraud and corruption risks/issues, it can be described in this section.

Requirements of employees and managers

In addition to complying with all integrity-related policies including the Code of Conduct and Ethics, employees are expected to cooperate with all initiatives aimed at preventing, detecting and responding to fraud and corruption. This includes risk assessments, training and education, audits and investigations and the design and implementation of controls.

Managers are also expected to:

- ensure all agreed controls aimed at preventing, detecting and responding to fraud and corruption are in place
- alert the policy owner [or other suitable person] of any undocumented or emerging fraud and corruption risks
- ensure suppliers and contractors are aware of [Agency name]'s policies and expectations in relation to fraud and corruption

