

## **Fraud and Corruption Prevention Policy**

### **1. PURPOSE**

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The purpose of this policy is to prevent, detect, and respond to fraud and corruption within Torres Strait Island Regional Council (**Council**), ensuring compliance with Queensland legislation and promoting integrity, transparency, and accountability in Council operations.

### **2. SCOPE**

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This policy applies to all Council employees, Councillors, contractors, consultants, volunteers, and any individual or entity engaged in business with Council.

### **3. LINK TO CORPORATE PLAN 2025-2030**

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- 3. A proactive and responsible Council
  - 3.1 Provide good governance and leadership

### **4. POLICY STATEMENT**

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Council is committed to:

- A zero-tolerance approach to fraud and corruption.
- Establishing effective prevention, detection, and response mechanisms.
- Complying with legislative requirements and integrity frameworks.
- Encouraging ethical behaviour and transparency within all Council operations.
- Protecting whistleblowers and ensuring confidentiality in reporting suspected fraud or corruption.

### **5. FRAUD AND CORRUPTION PREVENTION**

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Council will implement the following measures to prevent and mitigate fraud and corruption risks:

#### **5.1 Governance and Leadership**

- The CEO and Executive Leadership Team (**ELT**) are responsible for fostering a culture of integrity.
- Fraud and corruption risk assessments will be conducted periodically.
- A Fraud and Corruption Control Plan will be maintained in accordance with CCC and QAO guidelines.

#### **5.2 Internal Controls**

- Council will establish clear financial, procurement, and asset management controls to prevent fraudulent activities.
- Conflict of interest disclosures will be required for all Councillors and employees.
- High-risk transactions will be subject to increased scrutiny.

### 5.3 Employee Responsibilities

- Employees must report any suspicions of fraud or corruption immediately.
- Mandatory fraud awareness training will be provided to all employees.
- Employees must adhere to the Code of Conduct and Public Sector Ethics Principles.

### 5.4 Third-Party Engagement

- Contractors and suppliers must comply with Council's fraud and corruption prevention standards.
- Due diligence checks will be conducted before engaging vendors.

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## 6. REPORTING AND INVESTIGATING FRAUD AND CORRUPTION

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### 6.1. Reporting Obligations

- Suspected fraud or corruption must be reported to:
  - CEO (or delegated officer)
  - Crime and Corruption Commission (**CCC**) if the matter involves corrupt conduct
  - Queensland Police Service (**QPS**) for criminal fraud cases
- Reports can be submitted via email, in person, or through the confidential reporting hotline.

### 6.2. Confidentiality and Whistleblower Protection

- Council will protect individuals who report fraud or corruption in good faith.
- Whistleblower disclosures will be handled under the *Public Interest Disclosure Act 2010* (Qld).

### 6.3. Investigation Process

- The CEO will initiate an internal review or refer the matter to an external authority.
- Investigations will be conducted impartially and in accordance with legal requirements.
- Disciplinary action will be taken where allegations are substantiated.

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## 7. REPORTING COUNCILLOR INVOLVEMENT

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Where suspected fraud or corruption involves a councillor, the matter may constitute misconduct or corrupt conduct under the *Local Government Act 2009 (Qld)*. In such cases, the matter must be referred to the OIA and/or the CCC, as appropriate. Council staff must not investigate such matters internally.

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## 8. MONITORING AND CONTINUOUS IMPROVEMENT

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- Fraud and corruption risks will be reviewed annually.
- Policy effectiveness will be assessed against best practice guidelines.
- Updates will be made in response to legislative or operational changes.

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## 9. DEFINITIONS

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**Fraud:** Any dishonest activity causing actual or potential financial loss to Council, including theft, deception, misuse of position, or deliberate misrepresentation.

**Corruption:** Dishonest or unethical conduct that involves a breach of trust, misuse of power, or an attempt to gain an undue advantage.

**Public Official:** A person employed by, or associated with, Council who is subject to the *Crime and Corruption Act 2001 (Qld)*.

**Corrupt Conduct:** Conduct by a person that adversely affects the honest and impartial performance of Council functions, including bribery, extortion, and collusion.

**Reasonable Suspicion:** A belief based on facts that a fraud or corruption offence may have occurred.

**Office of the Independent Assessor (OIA):** An independent statutory body responsible for receiving and assessing complaints about the conduct of councillors under the *Local Government Act 2009 (Qld)*.

## 10. RELATED DOCUMENTS AND REFERENCES

- *Crime and Corruption Act 2001 (Qld)*
- *Local Government Act 2009 (Qld)*
- *Local Government Regulation 2012 (Qld)*
- *Public Interest Disclosure Act 2010 (Qld)*
- *Public Sector Ethics Act 1994 (Qld)*
- *Local Government (Councillor Complaints) and Other Legislation Amendment Act 2018 (Qld)*
- Queensland Audit Office (QAO) Fraud Management Guidelines
- Crime and Corruption Commission (CCC) Fraud and Corruption Control Best Practice Guide
- Code of Conduct for Employees
- Fraud and Corruption Control Procedure
- Public Interest Disclosure Policy and Management Program
- Conflict of Interest Policy
- Complaint Management Procedure

## 11. REVIEW

Policy type:	<input checked="" type="checkbox"/> Council <input type="checkbox"/> Administrative
Directorate:	Corporate Services
Responsible Officer:	Manager Governance and Risk
Authorised on:	November 2025
Next review date:	November 2028 (This policy will be reviewed every three years or as required by changes in legislation).
Review history:	2016, 2020, 2021, 2022, 2025
Version:	October 2025