

Riverina Water County Council Fraud Prevention Plan

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| <p>Introduction</p> <p>The purpose of this fraud prevention plan is to implement Riverina Water County Council’s Corruption Prevention Policy by achieving the following outcomes.</p> | | |
| <p>OUTCOMES What we want to achieve</p> | <p>CURRENT ACTIVITIES: POLICIES/PROGRAMS/etc What we currently do to achieve this outcome</p> | <p>PLANNED ACTION What will be done to achieve this outcome</p> |
| <p>THE FOUNDATIONS Leadership Executive, managers and supervisors are committed to successful implementation of the corruption prevention policy and the corruption prevention plan.</p> | <p>Code of Conduct specifies managers’ responsibilities for promoting integrity and preventing corruption. Managers’ job descriptions include these responsibilities. Managers’ performance reviews measure these responsibilities.</p> | <p>Mandatory management training will include modules on promoting integrity and preventing corruption. Promotion and selection of managers will include criteria related to ethical management</p> |
| <p>Executive, managers and supervisors lead by example and support Council’s standards and values</p> | <p>Policy requires all staff including senior managers to register financial interests and report gifts received in course of work.</p> | <p>Council policy and procedures will be included as a component of annual staff appraisal</p> |
| <p>Corruption prevention is integrated into business planning activities, including audit plan and appropriate policies and procedures</p> | <p>Line managers contribute to corruption risk management by identifying corruption risks related to their operational responsibilities.</p> | <p>Corruption prevention initiatives will be included as a regular agenda item at line manager meetings</p> |

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| <p>Organisational culture Executive, managers and supervisors contribute to the development and maintenance of an ethical culture</p> | <p>Managers involved with staff in Code of Conduct training</p> | <p>An annual survey of staff will be introduced as a regular corporate activity and will include questions on ethical culture.</p> |
| <p>Standards and values Council promotes its standards and values as contained in its Statement of Business Ethics and Code of Conduct.</p> | <p>Organisational values are published in the code of conduct and the statement of business ethics for staff, suppliers and contractors.</p> | <p>Copies of the organisation's code of conduct and its statement of business ethics will be available on its public website.</p> |
| <p>Code of Conduct Council has a Code of Conduct that reflects its values and standards of conduct that is communicated to all staff.</p> | <p>The Code of Conduct is available on the intranet and is provided to all staff at the time of induction. The Code of Conduct is scheduled to be reviewed every 4 years.</p> | <p>Code of conduct training is scheduled for all staff</p> |
| <p>Staff understand and adhere to the Code of Conduct and to agency standards and values.</p> | <p>-</p> | <p>Staff feedback based on questions of ethical culture will be included as part of annual staff appraisals</p> |
| <p>Policies, procedures and systems Councils operations are supported by adequate policies, procedures and systems</p> | <p>Policies are reviewed regularly. The staff position assigned as the responsible manager of each policy is clearly stated on the policy. Policies also contain review dates.</p> | <p>Managers will be encouraged to inform the responsible manager of policies if the policy or procedure is effective or has become obsolete or can easily be subverted.</p> |

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| <p>USING ORGANISATIONAL SYSTEMS Financial management systems The agency's financial controls are effective and comply with all applicable standards.</p> | <p>Council operates a software package known as "Authority" as its management and financial resource. A policy has been developed that establishes specific requirements to protect the integrity and data of this system.</p> | <p>The policy relating to the operation of "Authority" management and accounting systems is publicised on the intranet. This policy provides controls for rights to view, modify data or move values in the system.</p> |
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| <p>Performance management systems Council administers a performance management system that applies to all levels of staff.</p> | <p>Council undertakes an annual review of all staff which addresses skills and performance</p> | <p>The performance review component is been redesigned to provide for a briefing on anti corruption procedures and opportunities for feedback.</p> |
| <p>IT systems Councils IT systems are robust, comply with all applicable standards and are used to address corruption risks.</p> | <p>Council has established procedures and controls over the management of its IT systems. The annual budget provides for scheduled maintenance and upgrades of hardware and software</p> | <p>An IT Co-ordinator is engaged by Council to ensure management and compliance of the system as well as its ongoing maintenance and development</p> |
| <p>Records management Physical and electronic records of all Council activities are made and retained according to legal and government policy obligations</p> | <p>Council ensures regular training in management and compliance requirements of all its physical and electronic records. Access to the records is addressed in this training</p> | <p>Access and maintenance to the records is controlled and managed by a responsible officer</p> |
| <p>Council records are adequately stored, managed and secured</p> | <p>Staff are aware of the importance of records management .Storage facilities are secured and monitored</p> | <p>Record storage has been upgraded in conjunction with new building construction. The need for staff training in this area is evaluated in conjunction with annual staff appraisals and industry updates.</p> |
| <p>Agency records are accessible.</p> | <p>Delegations have been reviewed to provide appropriate access to records</p> | <p>Delegations are made available to staff.</p> |

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| <p>Internal audit Internal audit assists and supports the corruption risk management process</p> | <p>Council has recognised the importance of internal audit facilities and procedures to manage corruption risk.</p> | <p>Internal audit facilities are provided through a contract agreement with Wagga Wagga City Council governance unit. Council operates an internal audit committee which meet quarterly.</p> |
| <p>Internal Audit is proactive in designing and running programs aimed at detecting corruption</p> | <p>Internal audit committee meets quarterly to review and evaluate corruption related programs and processes</p> | <p>All reviews by the internal audit committee are accompanied with recommendations for policy and procedural amendments. All amendments are provided to staff at team and managers' meetings.</p> |
| <p>Taking a risk management approach Risk management principles and processes are used to identify and manage corruption risks.</p> | <p>Risk management planning is recognised in a risk management policy and supporting management plan.</p> | <p>Risk management issues are supported by a draft risk management strategy and a risk management framework. A review of Councils Business Continuity Plan is also scheduled.</p> |
| <p>Identifying corruption risks Council reviews corruption risks as part of reviews of all policies relating to corruption. Corruption risks are also monitored in conjunction with the staff appraisal system</p> | <p>All policies have scheduled review dates and are promoted on the intranet and specific training sessions</p> | <p>All staff are encouraged to respond to corruption risks by including corruption prevention as an item in the Team Leader briefing agenda</p> |
| <p>Managing corruption risks Corruption risk management strategies are in place to manage corruption risks</p> | <p>Strategy includes continual education of staff in policies and procedures relating to corruption risk, training of all staff in code of conduct and promoting protected disclosure procedures on the intranet to all staff. Programs are also developed by the internal audit committee to address potential corrupt conduct</p> | <p>Training programs scheduled and implemented. Policy updated and publicised. Internal audit committee provides reports to council</p> |

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| <p>DETECTING CORRUPTION Checking and work review There are sound supervision ,checking and work review practices in place</p> | <p>Procedures for corruption detection include relevant provisions for random checks and promotion of reporting provisions to all staff</p> | <p>Internal Audit committee establishes and reviews internal checks .Staff performance reviews publicise protected disclosure reporting procedures and offer opportunities for feedback on potential corruption. Code of conduct training also addresses corruption control.</p> |
| <p>Complaints and grievances Customer complaints are encouraged, facilitated and followed up</p> | <p>Council Code of Conduct and Complaints Management Policy are promoted on the council website</p> | <p>Procedures and potential corruption issues are evaluated in conjunction with responses to complaints</p> |
| <p>RESPONDING TO CORRUPTION Internal investigation Internal investigation is conducted by Council or appropriately resourced where necessary</p> | <p>Policies and procedures outline processes and responsibilities for investigation</p> | <p>Training in code of conduct and promotion of policies ensures all staff are aware of the investigative procedures.</p> |
| <p>External Reporting Corrupt conduct is reported to appropriate external authorities, such as ICAC and NSW Police.</p> | <p>Policies and procedures outline circumstances where external reporting of corrupt conduct is required.</p> | <p>External reporting procedures and detail is contained in Council policies and procedures</p> |
| <p>Disciplinary Action Appropriate disciplinary action is taken in response to breaches to code of conduct and related policies</p> | <p>All breaches to the code of conduct and associated policies are fully investigated and disciplinary action is determined by the General Manager in conjunction with any advice from human resources personnel</p> | <p>All disciplinary procedures are formally recorded. Policies and procedures are amended where considered necessary</p> |