Fraud and Corruption Control System Policy

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1 Purpose

This Policy sets out the **Fraud and Corruption Control System (FCCS)** and covers the responsibilities for managing fraud and corruption risks within the Department of Communities and Justice (DCJ).

FCCS outlines the key minimum requirements necessary to establish and maintain an appropriate system of fraud and corruption control. It consists of:

- Fraud and Corruption Control Framework
- Fraud and Corruption Control System Policy (this policy)
- Fraud and Corruption Control Plan.

FCCS is consistent with the Australian Standard (AS) on Fraud and Corruption Control (AS 8001:2021) and the TC18-02 NSW Fraud and Corruption Control Policy.

What is fraud and corruption?

Corrupt conduct is defined by the Independent Commission Against Corruption (ICAC) as deliberate or intentional wrongdoing, not negligence or a mistake. For the purposes of this Policy, it must involve or affect an NSW public official or public sector organisation.

While it takes many forms, corrupt conduct occurs when:

- a public official improperly uses, or tries to improperly use, the knowledge, power, or resources of their position for personal gain or the advantage of others
- a member of the public influences, or tries to influence, a public official to use their position in a way that affects the probity of the public official's exercise of functions
- a member of the public engages in conduct that could involve one of the matters set out in section 8(2A) of the *Independent Commission Against Corruption Act* where such conduct impairs, or could impair, public confidence in public administration.

  Some examples of this are:

  - collusive tendering
  - improper use of their position or access to information to gain or seek to gain a benefit or advantage for themselves or any other person
  - dishonestly obtaining or helping in obtaining, or dishonestly benefiting from, the payment or application of public funds for private advantage or the disposition of public assets for private advantage
  - defrauding the public revenue
  - fraudulently obtaining or keeping employment or appointment as a public official.

DCJ considers it an obligation of its employees and business associates that such conduct be promptly reported.

2 Definitions

Term	Definition
Business area	A functional unit responsible for delivering services as part of a DCJ Division.
Business Associate	External party with whom DCJ has, or plans to set up, some form of business relationship. For example, Non-Government Organisations (NGOs), suppliers and other service providers.
Control	Controls include any process, policy, device, or other action which may modify risk. Controls may not always exert the intended or assumed effect on a risk. (ISO 31073:2022 Risk management – Vocabulary, as referenced in AS 8001:2001 Fraud and Corruption Control)
Corruption	Dishonest activity in which a person associated with an organisation (e.g., senior executive, manager, employee, or contractor) acts contrary to the interests of the organisation and abuses their position of trust in order to achieve personal advantage or advantage for another person or organisation. (AS 8001: 2021 – Fraud and Corruption Control)
Corrupt Conduct	Corrupt conduct includes: a. any conduct of any person (whether or not a public official) that adversely affects, or that could adversely affect, either directly or indirectly, the honest or impartial exercise of official functions by any public official, any group or body of public officials or any public authority, or b. any conduct of a public official that constitutes or involves the dishonest or partial exercise of any of their official functions, or c. any conduct of a public official or former public official that constitutes or involves a breach of public trust, or d. any conduct of a public official or former public official that involves the misuse of information or material that they have acquired in the course of their official functions, whether or not for their benefit or for the benefit of any other person. (See *s 8 Independent Commission Against Corruption Act 1988 (NSW)* (ICAC Act).
Conflict of Interest	A conflict of interest exists when a reasonable person might perceive that an employee's personal interests could be favoured over their public duties.
Cybercrime	Criminal activity where services or applications in the cyberspace are used for or are the target of a crime, or where the cyberspace is the source, tool, target, or place of a crime.
Employee	Refers to all ongoing, temporary, and casual employees, contractors (contingent labour), consultants and volunteers

Term	Definition
External fraud	External fraud or externally instigated fraud is a fraudulent activity where no perpetrator is employed by or has a close association with the target organisation. (AS 8001: 2021 – Fraud and Corruption Control, 1.4.12)
Fraud	Dishonest activity causing actual or potential gain or loss to any person or organisation including theft of monies or other property by persons internal and/or external to the organisation and/or where deception is used at the time, immediately before or immediately following the activity. (AS 8001: 2021 – Fraud and Corruption Control)
Fraud and Corruption Control System	Framework for controlling the risks of fraud and corruption against or by an organisation. (AS 8001: 2021 – Fraud and Corruption Control, 1.4.14)
Fraud and corruption event	Instance of fraudulent or corrupt activity against or by an organisation. (AS 8001: 2021 – Fraud and Corruption Control, 1.4.15)
Internal fraud	Internal fraud or internally instigated fraud is a fraudulent activity where at least one perpetrator is employed by or has a close association with the target organisation and has detailed internal knowledge of the organisation operations, systems and procedures. (AS 8001: 2021 – Fraud and Corruption Control, 1.4.22)
Organisation	Person or group of people that has its own functions with responsibilities, authorities and relationships to achieve its objectives. (ISO 37001:2016 (em), 3.2 as referenced in AS8001: 2021: 1.4.26)
Risk	The effect of uncertainty on objectives. (ISO 31000:2018 – Risk Management)
Target organisation	Target organisation is an organisation that is the object of a fraud or corruption event whether initiated by persons internal to the organisation or external to it.
Technology-enabled Fraud	Fraud against, or by an organisation which relies heavily on information technologies, and which would not be possible without information technologies. (AS 8001: 2021 – Fraud and Corruption Control)
Those charged with governance	Under Australian Auditing Standards ASA 260[1], 'those charged with governance' include person(s) or organisation(s) (e.g., a corporate trustee) with responsibility for overseeing the strategic direction of the entity and obligations related to the accountability of the entity.

[1] Auditing Standard ASA 260 Communication with Those Charged with Governance.

3 Policy Statement

DCJ has a zero-tolerance approach to fraud and corruption. Disciplinary and/or legal action will be taken against those who commit fraud or corruption.

DCJ is committed to preventing and minimising the incidence of fraud and corruption by implementing and regularly reviewing a range of strategies and controls that aim to prevent, detect, and respond to fraud or corrupt conduct.

A breach of this policy may lead to disciplinary action including termination of employment or engagement.

Individuals found to have committed an offence under any relevant legislation may also be subject to penalties under those legislation, which can include criminal charges.

4 Scope

The FCCS applies to all employees and recognises the role that each person has in preventing, detecting, and reporting suspected fraudulent and/or corrupt conduct. It is the responsibility of all employees to behave in a lawful and ethical manner.

Business associates such as suppliers and NGOs are expected to have similar fraud and corruption control measures in place to prevent, detect, and respond to corruption as prescribed in the DCJ's Statement of Business Ethics.

This policy does not operate in isolation and should be read in conjunction with DCJ's other policies (refer to the 'Related Policies' section of this document).

5 Fraud and Corruption Control Framework

The DCJ Fraud and Corruption Control Framework (the Framework) is an integral part of risk management framework. It seeks to control:

- internal fraud and corruption against DCJ and its operations
- external fraud and corruption against DCJ and its operations
- fraud and corruption involving persons internal to the organisation in collaboration with persons external to the organisation, and
- fraud and corruption by the organisation or by persons purporting to act on behalf of and in the interests of the organisation.

DCJ's fraud and corruption control framework consists of both foundational activities and activities related to controls (prevention, detection, and response) as outlined in the table below:

Fraud and corruption **foundations**	Fraud and corruption **prevention**
Foundations for fraud and corruption risk management include: • conducting a risk environment scan • adopting a policy statement • conducting regular risk assessments • establishing governance structures • maintaining risk awareness and capability • measuring effectiveness of internal controls • accurate record keeping.	Fraud and corruption **prevention** activities include: • promoting strong counter fraud and corruption culture • managing Conflicts of Interest • managing risks related to Gifts, Benefits and Bequests • implementing and maintaining internal control systems • workforce screening mechanisms • preventing "technology-enabled" fraud • physical security and asset management.
Fraud and corruption detection	**Fraud and corruption response**
Fraud and corruption **detection** activities include: • post-transactional review • notification systems • detection systems • third party management systems • internal controls testing framework and system • complaint management • whistleblower protection • data analytics • exit interviews.	Fraud and corruption **response** activities include: • investigation systems • disciplinary procedures • response and recovery plan • crisis management • internal reporting and escalation • external reporting • insurance management • third parties • responding to fraud and corruption events involving business associates.

Table 1: DCJ Fraud and Corruption Control Framework

6 DCJ Fraud Control Plan

DCJ's Fraud Control Plan is made up of the following eight elements[2]:

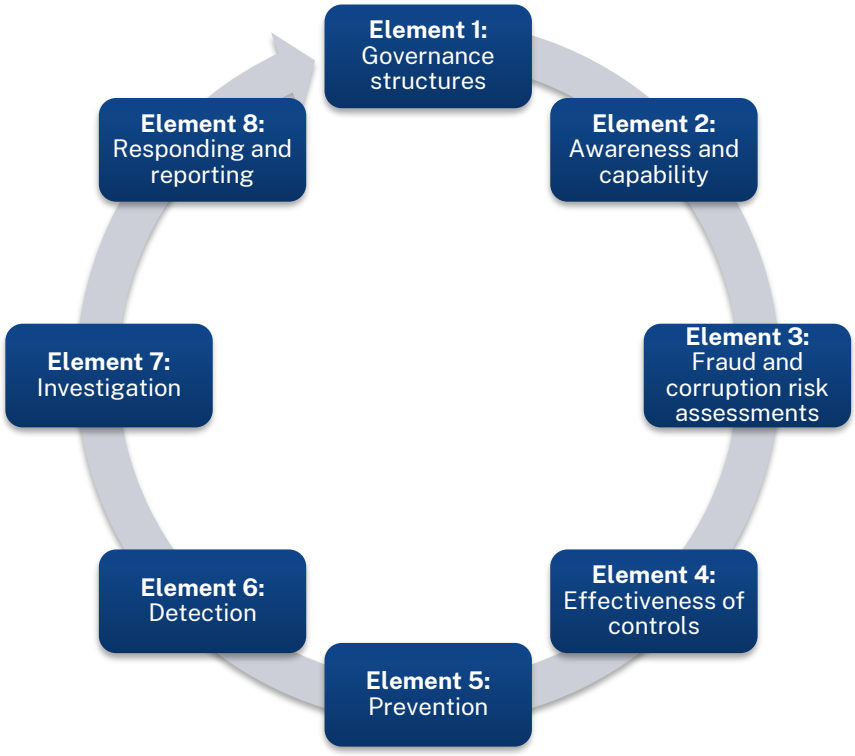

Figure 1: Eight elements of the DCJ's Fraud Control Plan

6.1 Element 1: Governance structures

Managing risk is an important governance issue and, by logical extension, managing fraud and corruption risk is an important governance issue[3]. DCJ is committed to controlling fraud and corruption risks. Key responsibilities of the governance structure and all employees is outlined in the Section 7 - Responsibilities.

DCJ Chief Fraud Control Officer (CFCO) appointed by the Secretary is a key contact for escalating all fraud and corruption related matters to the DCJ Executive Leadership Team (ELT) and reporting to internal and external bodies. At DCJ, the Chief Financial Officer role is also the CFCO.

The CFCO works in conjunction with the Chief Risk Officer[4], the Chief Audit Executive[5], and supported by the Fraud and Corruption Control Unit (FCCU) to manage enterprise risks of fraud and corruption.

[2] AS 8001:2021 Fraud and Corruption Control – structure of FCCS
[3] ibid.,8.
[4] Role held by the Deputy Secretary, Corporate Services Division of DCJ
[5] Role held by the Director Internal Audit, Governance, Risk, Audit, & Compliance Branch, Corporate Services

6.2 Element 2: Awareness and capability

DCJ is committed to delivering fraud and corruption awareness raising programs by adopting a zero-tolerance approach through its various activities including:

- online learning modules (Code of Conduct, Public Interest Disclosures, Cyber Security Awareness, Privacy and You, Conflicts of Interest etc.)
- regular review of fraud and corruption risks at a local (project/business area, divisional and enterprise level)
- related policies and procedures, for example (and not limited to) Conflicts of Interest Policy, Senior Executive Private Interest Declaration Policy, Procurement Governance Framework and Policy, Information Security Policy, and Records Management Policy
- publication of Business Ethics Statement and related contractual policies for third parties working/intends to work with DCJ
- promotion of articles through the DCJ Intranet, messages from leaders and opportunities for capability development through performance development plans
- role specific training and capability uplift through 'on the job' exposure.

Overall responsibility for the 'fraud and corruption awareness and capability development' program rests with:

- the DCJ ELT for implementation with aspects delegated to the appropriately qualified resources within DCJ
- all employees for proactively taking part in the program supported by their line managers and senior executives.

6.3 Element 3: Fraud and corruption risk assessments

Fraud and Corruption (FC) are business risks and will have a similar impact on the organisation as other types of enterprise risk including financial loss, loss of information, reputational impact etc. At DCJ, 'Fraud and corruption' is identified as one of the enterprise risks.

While all employees have a responsibility to help in managing risk, different groups within DCJ are responsible for specific fraud and corruption risk management activities:

Risk Activity	DCJ Divisions	DCJ Executive Leadership Team	ERM Team/FCCU
Risk Documentation	Record key local FC risks in Divisional FC risk register. A summary FC risk should be recorded in the "general" divisional risk register.	Record key organisational FC risks in Enterprise Risk Register.	FCCU will support Divisions to identify specific FC risks to be documented in the FC risk register and liaise with the Enterprise Risk Management (ERM) team to update the related summary risk in the "general" risk register.
Risk Assessment	Participate in Division-level FC risk assessment every 6 months.	Review outputs of Divisional risk assessments every 6 months and update Enterprise-level FC risks accordingly.	FCCU will facilitate Divisional FC risk assessments and liaise with the ERM team to update the related Enterprise-level risk/s.
Risk Review	Quarterly review of Divisional FC controls and emerging risks in conjunction with "general" risk review process. Review the DCJ Enterprise Fraud and Corruption Risk Register every 6 months, ensuring that significant divisional FC risks, key controls, and treatments that could have an impact on FC at the enterprise level are recorded accurately.	Quarterly review of Enterprise FC controls and emerging risks in conjunction with "general" risk review process.	FCCU will align reviews of FC risks to the quarterly cycle of "general" risk reviews led by the ERM team.
Risk Maturity Self-Assessment	Complete the FC Risk Maturity Self-Assessment Tool and report findings to the FCCU.	Review Divisional contributions to the annual Enterprise Risk Maturity Self-Assessment.	FCCU will facilitate the FC Risk Maturity Self-Assessment and produce an annual update report to the ELT and Audit and Risk Committee(s).

Table 2: Risk Assessment Responsibilities and Frequency

6.4 Element 4: Effectiveness of controls

While some controls are shared across DCJ, business areas are required to ensure that all processes specific to their area of responsibility is subject to a system of internal control that is well documented, regularly updated and understood by all personnel involved with these processes.[6]

The effectiveness of internal controls for managing fraud and corruption is assessed through DCJ's internal audit function. The audit engagements may not specifically look for fraud and corruption activities, however, alerts the business upon finding any instances through the assurance activity undertaken as per the approved annual internal audit program or upon request from the management.

DCJ is also subject to external assessment bodies such as and not limited to the Audit Office of NSW, Ombudsman etc. While external auditors have a prescribed role in fraud and corruption preventions and detection under Auditing Standards ASA 240, those charged with governance has the ultimate accountability for prevention and detection of fraud and corruption.[7]

6.5 Element 5: Prevention

At DCJ proactive prevention[8] of fraud and corruption initiatives include policies and procedures for:

- promoting a sound integrity framework through 'Code of conduct'
- managing conflicts of interest
- managing risks connected to gifts, hospitality, donations and similar benefits
- managing internal controls and the internal control environment
- managing performance-based targets
- workforce screening
- screening and ongoing management of business associates
- preventing technology-enabled fraud
- physical security and asset management.

For a robust fraud and corruption prevention program all business areas:

- are required to implement procedures that are aimed at assessing the operating effectiveness of their identified risk focussed internal controls
- must have a documented continuous improvement process that includes a regular review and update of the identified internal controls
- must ensure that weak or failed internal controls identified by internal and external assessments are remediated.

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[6] AS 8001:2021 Fraud and Corruption Control
[7] ibid.,19.
[8] ibid.,21.

6.6 Element 6: Detection

DCJ's proactive measures for detection of fraud and corruption includes (and is not limited to):

- identification of early warning signs through regular review of internal controls and risk assessments
- performing post-transactional reviews and analysis of management accounting reports
- independent assurance of corporate card transactions, payroll and accounts payable processes
- compliance activities related to the CFO Certification of the Internal Control Framework over Financial Systems and Information
- appropriate attestations for infrastructure assets, risk management and internal audit, financial management etc
- data analytics and reporting for decision making
- annual roll-out of the business ethics program including Senior Private Interest Declarations, Conflicts of Interest and Secondary and Unpaid Work declarations
- a continuous and ongoing cyber security awareness campaign activities such as Phishing (email) campaigns and Vishing (Phone) assessments to monitor cybercrime
- provision of Public Interest Disclosure mechanisms (See section 8 – Channels for reporting fraud and corruption) and a system for the protection and active support of the individuals reporting any fraud and corruption events
- a publicly available business ethics statement with specific information for reporting corrupt conduct
- review of customer feedback through various channels (phone, email, website) with an appropriate process in place for managing complaints and feedback (see DCJ Managing Complaints and Feedback Policy)
- regular reviews of exit surveys hosted on a third-party system PeoplePulse and via dedicated email.

6.7 Element 7: Investigation and other responses

DCJ undertakes various actions in responding to fraud and corruption events, some of which may include and are not limited to:

- implementation of immediate control measures on discovery of a fraud or corruption event
- investigation by specialist units within DCJ such as Conduct and Professional Services (CaPS), Professional Standards and Investigation (PSI), and Cyber Security teams
- disciplinary procedures
- internal reporting to DCJ Chief Fraud Control Officer and escalation
- external reporting
- recovery of stolen funds or property and insurance activities.

6.8 Element 8: Recording and Reporting

DCJ is committed to keeping complete and accurate records of all matters related to a fraud or corruption event by:

- ensuring all instances of suspected fraud and corruption are appropriately recorded, assessed, and investigated (where relevant), and referred (where appropriate) to ICAC, NSW Police, other regulatory bodies, or other investigative units within and outside of DCJ
- providing de-identified information for reporting to:
    - Audit and Risk Committee
    - DCJ Executive Leadership Team
    - Audit Office of NSW
    - Other regulatory bodies as required
- handling sensitive content in accordance with the relevant DCJ policies and procedures
- assessing internal controls, systems and processes post-detection of a fraud or corruption event.

DCJ may choose to implement initiatives to disrupt fraud and corruption by:

- increasing audit activity related to specific business functions
- increased post-transactional review
- implementing additional/more rigorous internal controls such a separation of duties (on a temporary or permanent basis)
- mandating more awareness training focussing on the specific fraud or corruption event.

7 Responsibilities

7.1 Secretary

- Exercise leadership, promote a culture of probity and ethical conduct and model DCJ values.
- Drive and promote DCJ's no-tolerance fraud and corruption culture.
- Manage risk across DCJ as established by section 3.6 of the *Government Sector Finance Act 2018.*
- Ensure that DCJ has proper risk management processes and controls in place including those relevant to the identification and management of corruption.
- Provide notification of corrupt conduct to the Independent Commission Against Corruption (ICAC) in accordance with *section 11 of the ICAC Act* and NSW Police under *Section 316 of the Crimes Act 1900 (NSW)*.
- Appoint DCJ Chief Fraud Control Officer.
- Ensure DCJ has a dedicated function for managing disciplinary action against employees who are proven to have breached the Code of Ethical Conduct.

7.2 Audit and Risk Committee (ARC)

- As required by the Treasury Policy Paper 20-08 Internal Audit and Risk Management Policy for the General Public Sector (TPP20-08), the ARC is responsible to satisfy itself that DCJ has appropriate processes, controls, and systems in place to capture and effectively investigate fraud related matters.
- Review and oversight of the fraud and corruption prevention controls within DCJ and advise the Secretary on the adequacy of controls and outcomes.
- Assist the Secretary in discharge of their responsibilities in relation to TPP20-08, and the *Government Sector Finance Act 2018.*

7.3 Chief Fraud Control Officer

- Actively promote and champion DCJ's no-tolerance fraud and corruption culture.
- Act as the single point of contact for all escalated incidents of fraud and corruption across DCJ.
- Manage fraud and corruption risk across DCJ in conjunction with the Chief Risk Officer.
- Notify external parties on behalf of the Secretary of a fraud event to ICAC following the requirements of section 11 of the *Independent Commission Against Corruption Act 1988* (NSW) and to Police under section 316 of the *Crimes Act 1900* (NSW) where necessary with approval from the Secretary.
- Maintain an internal control framework as required by Treasury Policy TPG 24-08 *CFO Certification on the Internal Control Framework over Financial Systems and Information*. TPG 24-08 requires the CFO to work closely with the Chief Risk Officer and the Chief Audit Executive in the design of the DCJ internal control framework over financial systems and information to ensure it is proportionate and risk-based.
- Give specialist advice to the DCJ ELT, the ARC and other key stakeholders, and
- Maintain a thorough understanding of relevant legislation, regulations, Treasurer's Instruction and Australian Standards governing fraud and corruption control.

7.4 Chief Risk Officer

- Drive a positive risk culture that supports fraud and corruption risk management decision making at DCJ.
- Manage enterprise fraud and corruption risk profiling to identify areas of DCJ that are at higher risk of fraud and corruption.

7.5 Executive Leadership Team

- Support and promote a no-tolerance culture of fraud and corruption within DCJ.
- Maintain an awareness of DCJ's fraud and corruption exposures.
- Review the input from Divisions for the annual fraud and corruption maturity self-assessment.
- Review and steer the risk management processes, controls, and right performance metrics to provide effective oversight of the fraud and corruption enterprise risk.

- Communicate to all business areas within their remit irrespective of geographically location across New South Wales that they are accountable for fraud and corruption control and reporting matters within their operations.

7.6 Divisional Head, Executive Directors, Executive District Directors, Directors and Managers

- Perform fraud and corruption risk assessments as required by the DCJ enterprise risk management policy.
- Contribute to annual fraud and corruption maturity self-assessment.
- Consider fraud and corruption risk when developing business plans.
- Encourage employees input into planning and implementation of anti-corruption measures.
- Divisional management should perform a review of the internal control environment after any incident of fraud. The FCCU should be informed and consulted prior to performing the review. In cases of material fraud, the DCJ Fraud Control Officer, Chief Financial Officer, Chief Audit Executive, and Audit and Risk Committee may initiate a review to evaluate the effectiveness of the internal controls in preventing further fraud.
- Promote DCJ's commitment to providing high quality services to clients, through maintaining the highest standards of integrity and ethics.
- Report all employees related allegations of fraud and corruption to the Conduct and Professional Standards Unit or the Professional Standards and Investigations Unit (for Corrective Services matters).

7.7 DCJ People Branch

- Ensure the induction of new employees requires reading, understanding, and signing of the *DCJ Code of Ethical Conduct* and associated policies as part of the acceptance of employment.
- Develop and implement a Learning and Development program to promote employee awareness of the *DCJ Code of Ethical Conduct,* including induction, refresher training as well as support in the promotion of fraud and corruption education programs.

7.8 Those with responsibilities for fraud and corruption relating to DCJ Employees (i.e., Professional Standards and Investigations Branch and Conduct and Professional Standards)

- Coordinate DCJ's strategies/activities to prevent, detect and respond to corruption.
- Ensure that all corruption prevention related policies and procedures are communicated and available to employees and other relevant external parties.
- Ensure that all instances of reported suspected fraud and corruption are appropriately recorded, assessed, and investigated (where relevant), and referred (where appropriate) to ICAC, NSW Police, other regulatory bodies, or other investigative units within DCJ.
- Collate corruption statistics and relevant information to support regular reporting, including for the annual report.

- Support business areas (as required) to develop tailored strategies addressing specific requirements in relation to the mitigation and control of fraud and corruption.
- Provide a quarterly fraud and corruption report to the ARC and other regulatory bodies on an as needed basis.
- Oversee and/or manage serious allegations of corrupt conduct investigations that have been referred by employees, the Secretary, the Ministers' Office, a Professional Conduct unit, or Senior Management.
- Establish a proper investigation procedure to be consistently applied in undertaking fraud and corruption investigations.
- Liaise and update reporters as needed.

7.9 Fraud and Corruption Control Unit

- Manage the design and implementation of the Fraud and Corruption Control System including the framework, policy, plan, reporting templates, and related activities.
- Design, deliver, and coordinate fraud and corruption prevention awareness training.
- Liaise closely with the ERM team to develop and support fraud risk assessment artefacts (i.e., fraud risk assessment tools).
- Support the DCJ Fraud Control Officer to discharge their duties per this policy.
- Manage annual roll-out and reporting of the programs related to the fraud and corruption control system.
- Coordinate with other teams with responsibilities for fraud and corruption for analysis and reporting of the trends related to fraud and corruption events at DCJ to the DCJ ELT and the ARC.
- Apply innovative practices and use modern technologies to improve identification and reporting of fraud and corruption events.
- Undertake assessment of processes that assess the operational effectiveness of internal controls across all corporate policy areas. Examples of actions that can be used include sending a 'false' invoice for payment, email communication or a phone call to change the bank account details of a supplier, etc.
- Have a suitable governance arrangement in place to ensure:
    - assessments (pressure tests) are carefully designed to ensure there is no financial or non-financial loss to the organisation
    - appropriate accountability arrangements for senior executives and officers involved in assessment program
    - record keeping for key decisions, recommendations and actions
    - process for choosing and seeking approval for pressure tests, e.g. fraud or corruption risks with high-risk rating or high reliance on manual controls
    - processes for sharing results and collaborating with relevant internal and external stakeholders.
- Facilitate and support establishment of regular fraud and corruption compliance forums in collaboration with other areas across DCJ.

7.10 Other areas responsible for managing corruption allegations about DCJ contracted parties (Prudential Oversight, Housing Fraud Unit, etc.)

- Act as the DCJ's lead in dealing with relevant fraud and corruption matters (within their existing responsibility).
- Report all relevant fraud and corruption allegations to the relevant external bodies.
- Perform and/or manage relevant fraud and corruption assessments and investigations (where needed).
- Establish a suitable investigation procedure, aligned to this Policy, to be consistently applied in undertaking assessments and investigations.
- Establish agreements with Government agencies and DCJ for the purpose of obtaining data (i.e. Roads and Maritime Services, Births Deaths and Marriages, Immigration, Department of Human Services).
- Provide fraud and corruption information quarterly to the Governance, Risk, Audit and Compliance team and external regulatory bodies on an as needs basis.

7.11 Employees

- Report known and suspected corrupt and/or fraudulent behaviour to either their immediate supervisor, the Director Conduct and Professional Standards or the DCJ Fraud and Corruption 24/7 Hotline.

  The DCJ Public Interest Disclosure (PID) Policy and Procedure provides information on what protections are available to employees in making a report of serious wrongdoing and how will a report be dealt with.
- Cooperate with all corruption investigations that may take place.
- Proactively and constructively take part in any planning and implementation of anti-corruption/fraud control measures related to their role and otherwise across the organisation.
- Actively take part in training to prevent fraud and corruption at DCJ.

7.12 Managing Personal Information

Personal and health information collected by DCJ is required to be handled responsibly in accordance with the requirements of the *Privacy and Personal Information Protection Act 1998* (NSW) (PPIP Act) and the *Health Records and Information Privacy Act 2002* (NSW) (HRIP Act) as outlined in DCJ Privacy Management Plan. This includes ensuring information is only used and disclosed for permitted purposes and ensuring information is stored securely and protected from unauthorised access.

Data breach

When personal or health information held by DCJ is subject to unauthorised access, unauthorised disclosure, or loss (whether deliberate or inadvertent) an assessment must be made in accordance with the DCJ Data Breach Response Plan as to the eligibility of the breach. An eligible data breach involves reporting obligations to the Privacy Commissioner and affected individuals. Any queries about data breaches should be immediately directed to databreach@dcj.nsw.gov.au.

8 Channels for Reporting Fraud and Corruption

8.1 Public Interest Disclosures

- Refer to the Public Interest Disclosure Policy or
- Contact DCJ's Public Interest Disclosure Coordinator, Director of Conduct and Professional Standards.

8.2 Fraud and Corruption Hotline (24/7)

The Hotline has been set up to receive suspected fraud or corruption reports via an external independent provider (Core Integrity). The Hotline supports anonymous reporting while still allowing the investigator to seek further information from the anonymous reporter via a secure web-based system i.e., the anonymous reporter cannot be identified which allows the reporter to participate and track a matter through its investigation and to resolution.

Call: 1800 950 649 | Visit website: qrs.ly/DCJFraudHotline

Email: DCJFraudHotline@coreintegrity.com.au

Mail: PO Box 895, Darlinghurst NSW 1300

Scan: QR code (image on the right side of this text. If you are unable to scan, visit qrs.ly/DCJFraudHotline).

8.3 Contracted Service Providers

An allegation of fraud and corruption involving a contracted service provider should be directed to the relevant contract manager in the first instance. Otherwise use the Fraud and Corruption Hotline.

Call 1800 950 649 | Visit website: qrs.ly/DCJFraudHotline

Email: DCJFraudHotline@coreintegrity.com.au

8.4 Housing Fraud Unit

Email: HFU@dcj.nsw.gov.au | Visit Intranet: Tenant Fraud Unit

Mail: Housing Fraud Unit, Locked Bag 5000, Parramatta NSW 2124

Or

Call 1800 950 649 | Visit website: qrs.ly/DCJFraudHotline

Email: DCJFraudHotline@coreintegrity.com.au

8.5 Registrar of Community Housing

Call: 1800 330 940 | Visit website: www.rch.nsw.gov.au

Mail: The Registrar of Community Housing: 6 Paramatta Square, 10 Darcy St, Parramatta, NSW 2150

8.6 External Reporting Bodies

- Independent Commission Against Corruption (ICAC)

  Call 1800 463 909 | Online form www.icac.nsw.gov.au/reporting/report-corruption
- NSW Ombudsman

  Call 02 9286 1000 | Visit website: www.ombo.nsw.gov.au
- NSW Police

  Call 1800 333 000 (Crime stoppers)

  Visit website: https://www.police.nsw.gov.au/crime/frauds_and_scams
- Audit Office of NSW

  Call 02 9275 7100 | Visit website: www.audit.nsw.gov.au

  Email: governance@audit.nsw.gov.au
- Information and Privacy Commission

  Call 1800 472 679 | Visit website: www.ipc.nsw.gov.au

9 Related Legislation and Documents

Legislation

- *Crimes Act 1900* (NSW)
- *Government Sector Employment Act 2013* (NSW)
- *Independent Commission Against Corruption Act 1988* (NSW)
- *Ombudsman Act 1974* (NSW)
- *Public Interest Disclosures Act 2022* (NSW)

Other documents

- Public Service Commissioner Direction No 1 of 2022 - Managing Gifts and Benefits
- Treasury Circular TC18-02 NSW Fraud and Corruption Control Policy
- Treasury Policy Paper TPP20-08 Internal Audit and Risk Management Policy for the General Government Sector
- Commonwealth Fraud Prevention Centre

10 Related Policies

This Policy is consistent with the Australian Standard (AS) 8001:2021 Fraud and Corruption Controls and the ICAC Assessing Corruption Control Maturity Guide.

This policy integrates with DCJ's:

- Code of Ethical Conduct
- Conflicts of Interest Policy and Procedure
- Enterprise Risk Management Policy and Framework
- Gifts, Benefits and Bequests Policy and Procedure
- Information Management Policy (and related documents)
- Procurement Governance Framework Policy
- Senior Executive and Private Interest Policy and Procedure
- Secondary Employment and Unpaid Work Policy and Procedure

11 Quality Assurance and Continuous Improvement

The Fraud and Corruption Control System Policy will be reviewed at least every two years in the absence of any significant changes or more often, where required; considering legislative or organisational change, risk factors and consistency with other supporting policies.

12 Document Information

Document name	DCJ Fraud and Corruption Control System Policy
Document reference	TRIM REF: SUB24/362609
Replaces	0.1
Applies to	Whole of Department application (and other statutory entities across Communities and Justice Portfolio using the Corporate Policies as part of the Shared Performance Agreement).
Policy Administrator	Governance, Risk, Audit and Compliance Branch For Policy enquires please contact Fraud and Compliance Unit.
Approval	Deputy Secretary Corporate Services
Version	1.0
Due for review	December 2026
Policy owner	Fraud and Corruption Control Unit, Corporate Services

13 Support and Advice

Business unit	Fraud and Corruption Control Unit Governance, Risk, Audit and Compliance Branch, Corporate Services
Email	fraudandcorruption@dcj.nsw.gov.au
Support	FCCU Queries via Service Now

14 Version and Review Details

Version	Effective date	Reason for amendment	Reviewer	Due for review
1.1	1/9/2025	Inclusion of the FCCU ServiceNow support contact	Fraud and Corruption Control Unit	December 2026
1.0	10/12/2024	Incorporate fraud control framework and plan	Governance, Risk, Audit and Compliance	December 2026
0.1	22/03/2024	Harmonisation of policies from the former Family and Community Services and Department of Justice.	Audit Risk and Compliance Branch	Superseded by this policy.