

CULTURAL FACILITIES CORPORATION

Fraud and Corruption Prevention Plan and Policy

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FOREWORD

The Cultural Facilities Corporation (CFC) is accountable for the efficient and effective use of public resources. Every employee is responsible for creating and maintaining the highest standards of ethical behaviour.

Fraud and Corruption can severely undermine many aspects of our efficiency, effectiveness and integrity. The ramifications to the reputation of CFC and its business units – Canberra Theatre Centre, Canberra Museum and Gallery (CMAG) and ACT Historic Places (ACTHP) resulting from fraudulent or corrupt activity can be significant and long-lasting.

While it does not occur often, the unfortunate reality is that on occasion, some individuals do endeavour to obtain benefit by deception or use their position for corrupt purposes.

As a consequence, the CFC Fraud and Corruption Prevention Plan is designed to raise awareness of fraud and corruption in the workplace and provide information and assistance to staff on the prevention, detection and reporting of fraud and corruption. It aims to:

- protect CFC assets, interests and reputation from fraud and corruption risk;
- ensure a just and coordinated approach by the CFC in dealing with suspected acts of fraud and corruption;
- where appropriate, endeavour to safeguard the privacy and rights of individuals who are subject to the operation of this framework;
- help managers and staff to assess the adequacy of existing controls and to determine whether additional fraud and corruption treatments are required; and
- ensure that the CFC meets its obligations under the relevant legislation and policies developed for the ACT Government.

This Plan also demonstrates that CFC is committed to ensuring that fraud and corruption against the agency is minimised and that, where it does occur, it is rapidly detected, effectively investigated, appropriately prosecuted and that losses are minimised.

I urge you to become familiar with this Plan, as fraud and corruption can affect us all, be it through suspicion of fraudulent or corrupt activity, observation of this activity, or being inadvertently part of the process where fraud or corruption occurs.

I commend this CFC Fraud and Corruption Prevention Plan to you and ask you to use the plan to ensure we deter and prevent breaches, yet where necessary, identify, report and prosecute all aspects of fraud and corruption.

Harriet Elvin
Chief Executive Officer
Cultural Facilities Corporation

November 2021

FRAUD AND CORRUPTION POLICY

The CFC is committed to complying with the applicable ACT Public Sector Management Acts and Standards to minimise the incidence of fraud and corruption through the development, implementation and regular review of a range of fraud prevention and detection strategies.

The CFC uses resources on behalf of, and to benefit, the community of the ACT. It has an obligation to use these resources in an appropriate manner and to be responsible to the Minister, the ACT Legislative Assembly, and the wider community for their use.

CFC has implemented this policy to enhance integrity with the agency and to reduce the risk of fraud and corruption. This policy also assists staff to make decisions in the reporting of fraud, corruption and other criminal offences affecting the CFC.

All CFC staff, including contractors, have a responsibility to ensure that risk assessments are conducted and where necessary fraud and corruption prevention strategies are implemented and that suspicious activities are reported to the Senior Executive Responsible for Business Integrity Risk (SERBIR) or their business unit Senior Manager. The CFC SERBIR is currently the Chief Finance Officer, Corporate Finance.

Fraud and corruption against the CFC or other parties will not be tolerated in any form or degree. Staff are urged to exercise diligence, probity and the highest level of ethics in fulfilling their duties and in all dealings.

The CFC requires all staff to report suspicious activities in accordance with the procedures set out in the CFC's ***Chief Executive Officer Financial Instruction 1.7 – Integrity and Reporting Policy***.

Any instances of fraud or corruption detected as being perpetrated against the CFC will be fully investigated and the perpetrators prosecuted to the maximum extent allowed under the law.

Any person who reports a suspected incident of fraudulent behaviour can be assured that information that they disclose will be dealt with appropriately, followed up diligently and treated confidentially.

1. Executive Summary

1.1 Overview

Under the *ACT Public Sector Management Act 1994* and the ACT Integrity Policy, ACT agencies are required to prepare and review a Fraud and Corruption Prevention Plan (the Plan) and Fraud Risk Assessment (CFC Fraud Risk Register) every two years. The CFC has prepared the Plan to assist its staff in the management of fraud and corruption risks. The Plan should be read in the conjunction with the CFC Fraud Risk Register

1.2 Introduction

A Fraud and Corruption Prevention Plan is a key part of the governance framework for any organisation. Fraud and corruption are key risks which can impact on the ability of an organisation to achieve its goals. An effective Fraud and Corruption Prevention Plan can assist management in preventing fraud and corruption, ensuring any fraud which does occur is detected and if necessary, conducting effective fraud investigations to resolve any allegations of fraud or corruption which may arise.

This Plan applies to all staff and contractors engaged within the CFC.

2. Overview

2.1 Definitions

The CFC recognises that a proactive rather than re-active fraud and corruption prevention plan is an integral part of its governance framework. For the purposes of this Plan, the following definitions and descriptions of roles have been adopted.

CFC Board

The Board sets the CFC's policies and strategies for risk management, including through approval of the ***CFC's Risk Management Framework and Policy; Risk Management Plan; Strategic Risk Management Register; and Fraud and Corruption Prevention Plan and Policy***, and ensures that risks facing the CFC have been identified and assessed and that the risks are being properly managed.

Audit Committee

The Audit Committee reviews whether management has in place a current and comprehensive risk management framework, including through the ***CFC's Strategic Risk Management Framework and Policy, Strategic Risk Management Register***, and other associated policies, plans and procedures for effective identification and management of the CFC's :

- financial and business risks, including by monitoring insurance arrangements; and
- business continuity planning arrangements, including periodic testing of disaster recovery plans.

The Audit Committee reviews the ***Fraud and Corruption Prevention Plan and Policy*** and ensures the CFC has appropriate processes and systems in place to capture and effectively investigate fraud related information.

Conflict of Interest

The definition of ‘conflict of interest’ as set out by the Organisation for Economic Cooperation and Development (OECD),

*“A conflict between the public duty and private interests of public officials, in which public officials have private-capacity interests **which could improperly influence** the performance of their official duties and responsibilities.”*

Corruption

In accordance with the ACT *Integrity Commission Act 2018*, corrupt conduct under section 9 includes:

1. Conduct by a public official that constitutes the exercise of the public official’s functions as a public official in a way that is not honest or is not impartial;
2. Conduct by a public official or former public official that:
 - a. constitutes a breach of public trust; or
 - b. constitutes the misuse of information or material acquired by the official in the course of performing their official functions, whether or not the misuse is for the benefit of the official or another person;
3. Conduct that adversely affects, either directly or indirectly the honest or impartial exercise of functions by a public official or a public sector entity;
4. Conduct that:
 - a. adversely affects, either directly or indirectly the exercise of official functions by a public official or public sector entity; and
 - b. would constitute, if proved, an offence against a provision of the *Criminal Code*, chapter 3 (Theft, fraud, bribery and related offences);
5. Conduct that involves any of the following:
 - a. collusive tendering;
 - b. fraud in relation to applications for licences, permits or other authorities under legislation designed to protect health and safety, protect the environment or facilitate the management and commercial exploitation of resources;
 - c. dishonestly obtaining or assisting 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;
 - d. defrauding the public revenue;
 - e. fraudulently obtaining or retaining employment or appointment as a public official.

Examples of corruption include, but are not limited to:

- manipulating a tendering process to derive a personal benefit from the outcome;
- unauthorised use of ACT Government resources (including facilities and time) to operate a private business;
- selecting a recruitment candidate based on a personal relationship with the candidate, including the influencing of other recruitment decision-makers in the process;
- misusing information or material obtained during official duties;
- overstating working hours or claiming an allowance when not eligible;
- receiving gifts, benefits and hospitality in exchange for assisting a supplier or consultant; and
- not disclosing and/or allowing a conflict of interest to obtain a preferred outcome.

Fraud

Fraud is not restricted to obtaining monetary or material benefit. The benefits of fraudulent acts can either be tangible or intangible. Examples of fraud perpetrated by internal staff or by external third parties may include (but not limited to):

- assisting others to obtain a benefit;
- theft of money (cash, cheques, EFTPOS) due to ACT Government;
- charging personal expenditure on ACT Government issued credit or fuel cards;
- unapproved use and misuse of motor vehicles and other ACT Government assets;
- raising/submitting fictitious invoices;
- falsifying documents, including emails and identity, to effect payments and/or influence official decisions;
- submitting false claims for reimbursement;
- creating a non-existent (“ghost”) employee to effect salary payments to own bank account; and
- releasing misleading or inaccurate information for deceiving, misleading or to hide wrong-doing.

Integrity

Integrity within the ACT Public Service is defined within the ACT Public Service Code of Conduct. The Code defines integrity as “being apolitical, honest, dependable, and accountable in dealings with ministers, the Parliament, the public and each other. It means recognising achievement, not shirking uncomfortable conversations and implies a consistency in dealings with others”. In doing so, this includes adherence to the requirements of this Plan, by being accountable to control and report potential fraud and corruption.

Senior Executive Responsible for Business Integrity and Risk (SERBIR)

The Chief Finance Officer is currently performing the SERBIR role.

2.2 Objective

Consistent with the requirements of the *Public Sector Management Act 1994* and the Standards, the CFC must:

- ensure the proper use, control and security of its public monies;
- protect its organisational assets, reputation and interests;
- detect acts of fraud and corruption where preventative strategies have failed;
- investigate and seek to recover property that has been dishonestly acquired;
- put in place protective measures to prevent the undesirable consequences of fraud and corruption; and
- ensure that reporting obligations are met.

The Plan is therefore designed to give practical effect to these obligations and commitments and specifically to:

- assess the risk of fraud and corruption within the CFC;
- develop strategies to assist in the reduction of the risk;
- increase awareness of fraud and corruption and define the role of all staff in reducing the level of risk; and

- define processes for the management of suspected fraud and corruption.

3. Fraud and Corruption Control Principles

3.1 Responsibilities for Fraud and Corruption Management

Managing the risk of fraud and corruption in the CFC is the responsibility of all managers and staff throughout the organisation. Specific roles are as follows:

CEO

The CEO has primary responsibility for the management of fraud and corruption prevention measures and will:

- ensure compliance with the ACT Integrity Policy;
- foster an environment which makes active fraud and corruption control a clearly defined obligation for all staff;
- articulate clear standards and procedures to ensure the minimisation and deterrence of fraud and corruption;
- appoint a SERBIR and provide details of the appointment to the Public Sector Standards Commissioner;
- put in place procedures for the detection and prosecution of offences should they occur;
- ensure that incidents of fraud and corruption are reported;
- ensure that all staff undertake regular training in fraud and corruption control, ethics and the code of conduct; and
- report, through the Annual Report, on the implementation of fraud prevention strategies; and
- under section 62 of the *Integrity Commission Act 2018*, make mandatory corruption notifications as the head of a public sector entity.

Senior Executive Responsible for Business Integrity Risk (SERBIR)

The SERBIR will:

- ensure CFC has a current Fraud and Corruption Prevention Plan and Policy and a current Fraud Risk Register, and that these are revised every two years, or more frequently in defined circumstances;
- monitor implementation of the plan and coordinate any risk treatments;
- implement a program of Audit testing to assess the effectiveness of established controls to prevent and detect fraud;
- record all identified instances of fraud and corruption;
- act upon reported cases of suspected fraud and determine the appropriate course of investigation and actions; and
- report to the CEO on a regular basis.

Canberra Theatre Centre, CMAG and ACT Historic Places Directors

Senior Managers will:

- assist and support the SERBIR in fulfilling obligations arising from the Plan;
- ensure the wide dissemination of the Plan within the CFC;

- promote a sound knowledge of the Plan and promoting a culture of fraud control, integrity and reporting allegations of potential fraud and corruption (including all alleged attempts);
- foster and develop within the CFC the highest standards of ethical behaviour; and
- actively monitor compliance.

Executive (SES)

Under section 62 of the *Integrity Commission Act 2018* Senior Executives make mandatory corruption notifications as an SES member.

Management and Staff

Managers are to encourage, insist upon and implement sound financial, legal and ethical processes and ensure that the management decision making process is as open and transparent as possible. They should facilitate and participate in the program of Audit testing to assess the effectiveness of fraud controls led by the SERBIR.

Staff must make themselves familiar with the concepts and responsibilities of fraud and corruption control and ensure that they adhere to approved policies, practices and procedures at all times including the declaration of any conflict of interest, either real, potential, or perceived, immediately that conflict becomes apparent.

All contractors engaged by the CFC will be expected to adhere to these same requirements.

Audit Committee

The Audit function is closely linked to the Fraud and Corruption Prevention Plan and Policy, and implementation of an effective Audit program. The Audit Committee monitors the implementation of the Fraud and Corruption Prevention Plan and Policy and reviews the effectiveness of the fraud control arrangements and implementation of any recommendations.

Integrity Commission

The *Integrity Commission Act 2018* commenced on 1 July 2019, the Integrity Commissioner is an independent officer of the Legislative Assembly.

Section 23 of the Act sets out the functions of the Commission which include but are not limited to:

- investigate conduct that is alleged to be corrupt conduct; and
- refer suspected instances of criminality or wrongdoing to the appropriate authority for further investigation and action; and
- prevent corruption, including by—
 - researching corrupt practices; and
 - mitigating the risks of corruption; and
- publish information about investigations conducted by the commission, including lessons learned;
- provide education programs about the operation of this Act and the commission, including providing advice, training and education services to—
 - the Legislative Assembly and the public sector to increase capacity to prevent corrupt conduct; and
 - people who are required to report corrupt conduct under this Act; and

- the community about the detrimental effects of corruption on public administration and ways in which to assist in preventing corrupt conduct; and
- foster public confidence in the Legislative Assembly and public sector.

The Commission must keep the following parties informed:

- the complainant (section 72);
- referring entity (section 73); and
- notifier (section 74).

The Commission may investigate corruption reports or on own initiative or discontinue an investigation.

The Commission has power to enter premises with consent or via search warrants for search and seizure.

The Commission has the power to hold examinations for an investigation.

3.2 Risk Assessment

The CFC will undertake an independent fraud risk assessment at least every two years. Details of the fraud risks can be found in the CFC Fraud Risk Register.

3.3 Fraud and Corruption Awareness Training

Information sessions on fraud and corruption are presented across the CFC to increase staff awareness of the issues and the importance of an understanding of the risks and the requirement that all staff be actively aware of their personal obligations.

To ensure staff are actively aware of their obligations as a minimum it is recommended that general staff should complete an awareness session or refresher session in ethics, fraud and corruption prevention every three years, while higher risk profile areas should complete awareness sessions or refresher training every two years.

Ethics, Fraud and Corruption related material is included CFC staff induction.

3.4 Internal Controls and Audit

The design, development and maintenance of financial, administrative and operational systems, procedures and controls are paramount to the control of financial fraud and will always be undertaken with a view to the possibility of fraud and corruption and ensuring an appropriate audit trail exists.

Compliance with these procedures will be reviewed through spot checks and audits. The results of Audit reviews will be reported to the Audit Committee and incorporated into the CFC Fraud Risk Register.

3.5 Ethics

Two of the most important ethical factors that prevent fraudulent and corrupt activity are:

- the establishment and maintenance of a sound ethical behaviours culture; and
- an awareness of exposures and risks of fraud and corruption at all management levels.

Managers are required to manage risk, control costs, monitor and improve systems, institute proper controls and foster an ethical environment. The CFC expects all staff to behave ethically and to be responsible for minimising any possibility of fraud and corruption.

When faced with ethical dilemmas staff require guidance in deciding the appropriate course of action. This assistance is provided in the form of guidelines, established procedures, and by maintaining an open environment in which all staff are prepared to discuss ethical dilemmas.

3.6 Fraud Prevention Measures

There are a range of controls that relate to CFC as a whole or which affects the fraud control environment generally such as information security management, staff timesheets, gifts, benefits and hospitality, and travel.

The CFC's major fraud prevention strategies have been considered in the context of the CFC's Fraud Risk Register (November 2021)

The Plan contains a range of control measures intended to address potential risks associated with reliance on the trust and loyalty of staff.

4. Reporting and Case Handling Obligations

4.1 How to Report Suspected Fraud or Corruption

It is always the responsibility of all staff to act with honesty and integrity and to be vigilant for possible incidents of fraud and corruption.

Where staff become aware of possible fraud and corruption they must report their concerns and observe the following procedures:

1. Note observations

- Do not jump to conclusions.
- Carefully observe and note the suspected conduct.
- Document your own actions.

Keep any documents as possible evidence and do not alter them, and ensure they are stored securely.

2. Report concerns

Report concerns to Senior Managers, Supervisor or the SERBIR, who are available to provide advice on a confidential basis. The SERBIR is responsible for the initial receipt of information on suspected instances of fraud or corruption and to conduct preliminary investigation/review to determine if there is any basis for further action.

Current SERBIR contact details are:

Chief Finance Officer
Cultural Facilities Corporation
PO Box 939
Civic Square ACT 2608

Telephone: (02) 6205 2195

If there are concerns about reporting the matter with the SERBIR, staff should report to the CEO.

If there are concerns about reporting the matter with the CEO, staff should report to the ACT Ombudsman or the ACT Integrity Commissioner.

Persons reporting suspected fraud or corruption through a Public Interest Disclosure (PID) are protected under the provisions of the ACT *Public Interest Disclosure Act 2012*.

3. Inform only those who need to know

To prevent possible “tip-off,” and minimise obstruction of the investigative process (for example, by leading to the destruction of evidence). As protection against any pressure from those at the centre of the allegations.

4. Maintain confidentiality

To protect the rights of a person suspected of fraudulent activity that may in fact be innocent.

The CFC encourages staff to report fraud directly in preference to making anonymous reports, as matters reported anonymously may be difficult to pursue if further information is required. Anonymity prevents investigators being able to seek additional information, if required, during an investigation.

The SERBIR is responsible for maintaining an appropriate recording and tracking system to ensure that all instances of suspected fraud and corruption are satisfactorily resolved. This system facilitates the extraction of statistical data for monitoring the effectiveness of the Fraud and Corruption Prevention Plan and Policy and provides information required to meet annual reporting and other obligations. All personal information is kept confidential as part of any reports of alleged fraud and corruption.

4.2 Confidentiality

Staff who report evidence or suspicions of fraud can be confident that their identity and information will be treated in the strictest confidence, and that such action will in no way be permitted to adversely affect their position or prospects within the organisation. Indeed, staff are actively encouraged to be forthright and honest in all their dealings.

Staff aggrieved by the conduct of any investigations may raise their concerns in an appropriate manner with management, or if necessary through an appropriate, independent body such as the ACT Ombudsman, ACT Integrity Commissioner or the ACT Auditor-General.

4.3 Public Interest Disclosures

Staff should be aware that the ACT *Public Interest Disclosure Act 2012* and *Public Interest Disclosure Guidelines 2017* support the reporting of wrongdoing, including fraud and corruption. This Act provides for a method of investigating allegations, while protecting the individual who has made the disclosure from any reprisals. Members of the public, as well as current and former ACT public servants, may make a ‘*public interest disclosure*’ to any ACT government entity.

4.4 What are my rights?

Anyone suspected of committing fraud is innocent until proven guilty. If you are to be interviewed by a fraud investigator or feel you are suspected of committing improper behaviour or an offence, you have the right to:

- expect that your affairs will not be disclosed to and discussed with people not concerned with the matter;

- expect any interviews or investigations will adhere to the principles of procedural fairness;
- expect that interviews or investigations are not seen as imputing guilt;
- say nothing and not participate in an interview;
- not answer a question if you feel the answer may implicate you in the fraud;
- seek whatever advice you think is necessary, before the interview;
- have a solicitor, union representative or other person present, whilst being interviewed;
- have an interpreter present, if necessary; and
- request access to documents relating to the investigation.

For further information about what to expect, refer to the ACTPS Standards for the Conduct of Inquiries and Investigations.

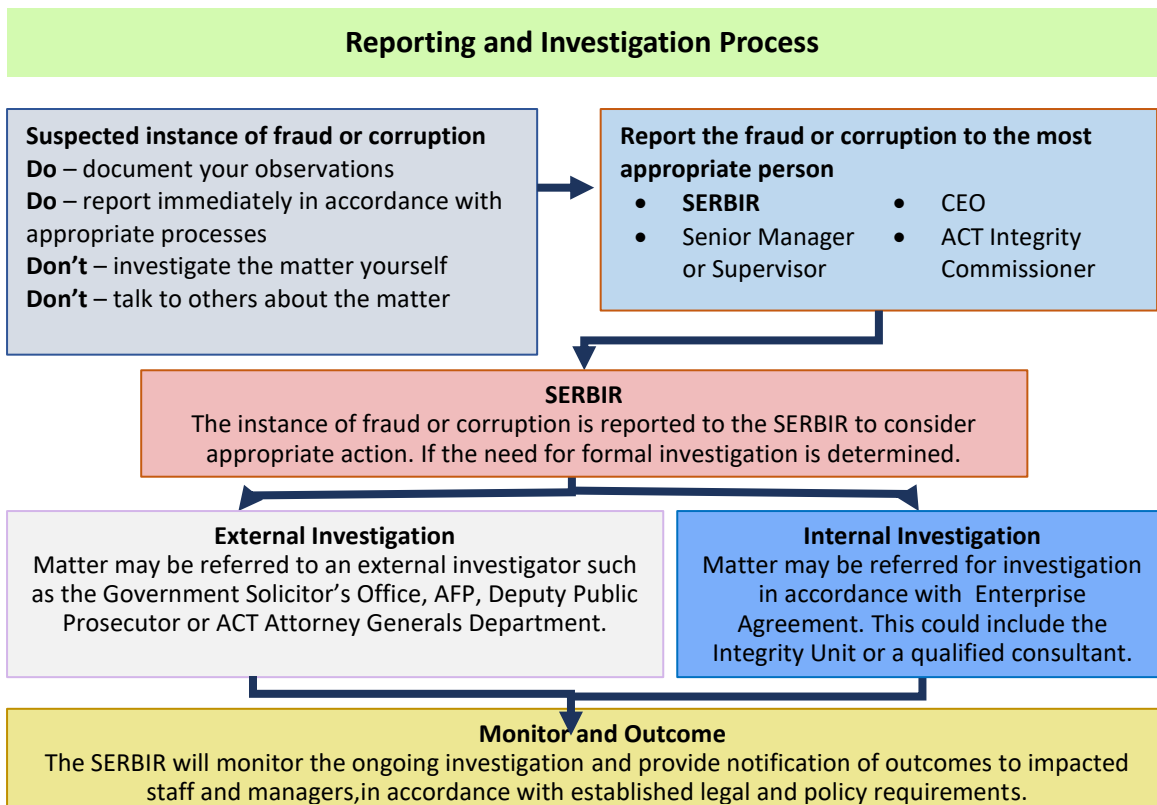
4.5 Preliminary Case Handling

Initial investigation into reported fraud will be made by the SERBIR, who will determine whether there is any basis for further action.

In the investigation process, care needs to be taken to avoid unfounded and incorrect accusations, unnecessarily and prematurely alerting individuals against whom allegations have been made who may in turn destroy evidence of fraud and making statements that could expose the CFC to legal liabilities for damages arising from a wrongful accusation.

If the SERBIR determines that there is a basis for further action, cases concerning criminal matters or intent will be referred to ACT Policing for investigation, other cases may be referred to an investigator qualified to the level of Certificate IV in Government (Fraud Control Investigation) to investigate further.

Reporting and Investigation Process – Flowchart



5. Fraud Risk Assessment

5.1 Fraud and Corruption Risk Assessment Methodology

The combined approach developed for this Fraud and Corruption Prevention Plan and Fraud Risk Register is in accordance with the *ACT Integrity Policy* and the Australian Standard 8001-2021 *Fraud and Corruption Control*.

The fraud and corruption risks associated with all the CFC's functions are assessed through a series of interviews with key staff. The assessment was undertaken at a strategic level. The assessment of the CFC's fraud environment, overall, is a **medium** fraud risk exposure. This conclusion is reached by considering all the risks in context, and the fact that most of the risks identified were being adequately treated by existing controls.

5.2 Strategies to Address Fraud and Corruption Risks

In line with Risk Management standard *AS/NZS ISO 31000:2018*, risks have been identified as being "medium" or those other risks that may have a material consequence yet lower rating.

The fraud and corruption risk assessment will be formally updated every two years. The SERBIR is responsible for this update which will include:

- updating the assessment of existing risks for changes in treatments, consequences or likelihood ratings if changes are deemed necessary;
- removing risks which are no longer relevant;
- identifying any new risks which should be included and addressed as part of the ongoing risk management process;
- updating the action plans to address the risks for new key risks; and
- identifying new treatment strategies/action plans.

5.3 Fraud Risk Summary

A summary of the fraud risk outcomes is outlined below according to the overall risk rating. Details can be found in the CFC Fraud Risk Register.

6. Fraud and Corruption Signals

Managers and staff should be alert to the common signs of fraud and corruption. Signals for potential fraud and corruption may include:

- Implausible excuses and reasons for unusual events or actions;
- Senior staff involved in routine process work such as purchasing, ordering and receiving goods;
- Staff evidently living beyond their means, who have access to funds, or control or influence over service providers;
- Excessive staff turnover;
- Staff who do not take holidays for extended periods;
- Potential conflicts of interest not declared;
- Undue secrecy or excluding people from available information;
- Staff who treat controls and standard practices as challenges to be overcome or defied;
- Unauthorised changes to systems or work practices;
- Missing documentation relating to client or agency financial transactions; and

- ‘blind approval’, where the person signing does not sight supporting documentation.

7. Records Management

Documents created or used during the management of an alleged fraud or corruption incident will be stored in the CFC’s electronic document and records management system - HP/CMS (with WIRE interface) in accordance with the *Territory Records Act 2002*. Access to relevant files should be restricted in accordance with the relevant security permissions. Personal information will be collected, used and disclosed in accordance with the *Information Privacy Act 2014*.

Data and statistics, with personal information removed, may be generated to assist with reporting on the management of allegations of fraud and corruption and their investigations.

8. Monitoring and Review of the Plan

CFC functions change and evolve and new systems and contracting arrangements are introduced, or systems and processes are modified. Every change presents the possibility of new or altered business risks and every change must therefore be subjected to the risk assessment process.

In addition, the Audit Committee may initiate Audits/compliance reviews designed to measure or monitor the implementation of the Plan or associated aspects of fraud and corruption.

ASSOCIATED DOCUMENTS

Documents that have been cited in this Plan can be found using the following links:

Integrity Commission Act 2018

<https://www.legislation.act.gov.au/a/2018-52/>

Public Sector Management Standards 2016

<https://www.legislation.act.gov.au/di/2016-251/>

Public Sector Management Act 1994

<https://www.legislation.act.gov.au/a/1994-37/default.asp>

Public Interest Disclosure Act 2012

<https://www.legislation.act.gov.au/a/2012-43/>

Public Interest Disclosure Guidelines 2017

<http://www.legislation.act.gov.au/ni/2017-290/>

Information Privacy Act 2014

<http://www.legislation.act.gov.au/a/2014-24/default.asp>

Fair Work Act 2009 (Commonwealth)

<http://www.comlaw.gov.au/Series/C2009A00028>

CFC Enterprise Agreement

<http://www.culturalfacilities.act.gov.au>

ACT Public Service Code of Conduct

http://www.cmd.act.gov.au/_data/assets/pdf_file/0017/363230/codeofcond2012_2013edit_wtables.pdf

ACT Public Service Code of Ethics

http://www.cmd.act.gov.au/_data/assets/pdf_file/0005/187178/codeofethics2010.pdf

ACT Public Service Integrity Policy

http://www.cmd.act.gov.au/_data/assets/pdf_file/0006/187179/integritypolicy2010.pdf

ACT Government Whole of Government Risk Management Guide and Tool Kit

<https://apps.treasury.act.gov.au/insurance-and-risk-management/risk-management>