



Bayside Council

Serving Our Community

Fraud and Corruption Policy

27 May 2026



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Fraud and Corruption Policy

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What You Need to Know

The Bayside 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, puts at risk the reputation of all staff, Councillors and delegates and undermines trust with our community.

Always read this policy in conjunction with the Related Documents identified below.

Policy Statement	<p>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.</p> <p>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.</p>		
Purpose	<p>Council is committed to maintaining trust and building advocacy with the community and its stakeholders through a robust and vigilant fraud and corruption prevention approach.</p>		
Risk Statement	<p>Council has a zero tolerance position on fraud and corruption</p>		
Scope	<p>Councillors, Officers, Employees, Volunteers and Contractors</p>		
Related Documents <i>(Procedure, forms, guides)</i>	<p>Fraud and Corruption Procedure – incorporating the NSW Audit Office's Fraud Control Improvement Kit (February 2015).</p>		
Compliance Requirements	<p>Independent Commission Against Corruption Act 1988 NSW Government Sector Finance Act 2018 Local Government Act 1993 NSW NSW Audit Office Fraud Control Policy (July 2020) Council's Code of Conduct Public Interest Disclosures Act 2022 Australian Standard AS8001-2008 Fraud & Corruption Control Ombudsman Act 1974 (NSW).</p>		
Policy Owner	<p>Manager: Governance and Risk</p>		
Effective Date	27 May 2026	Review Date:	27 May 2029
Review Period	<p>This Policy will be reviewed every three (3) years or as required.</p>		
Approver	<p>Council</p>		

1 Key Principles

1.1 Ethical Conduct

All individuals and entities identified in the scope of this policy are expected to conduct themselves with the highest ethical standards, avoiding any conflicts of interest, and acting in the best interests of the community.

1.2 Transparency

Council will ensure transparency in all our financial transactions, decision-making processes, and interactions with the public, stakeholders, and government agencies.

1.3 Accountability

Council will hold individuals and entities identified in the scope of this policy accountable for any fraudulent or corrupt activities which occur within or which impact our organisation or the community we serve.

1.4 Reporting Mechanisms

Council will establish clear and accessible mechanisms for reporting suspected fraud or corruption, enabling and protecting those who have the moral courage to take a stand against wrongdoing.

1.5 Legal Compliance

Council will comply with all applicable laws, regulations, and standards related to fraud and corruption control, including relevant NSW legislation.

2 Council's Commitment

That Council implements a fraud and corruption control plan which:

- a is aligned to the NSW Independent Commission Against Corruption Act 1988
- b is aligned to the Australian Standard AS8001-2008 for Fraud & Corruption Control
- c Follows leading practice guidelines for the establishment and maintenance of a Fraud and Corruption Control Framework to ensure effective management of fraud and corruption risks.

That Council makes available the resources to fund the successful implementation of a fraud and corruption control plan including the establishment of prevention, detection and response controls.

That Council reports fraud and corruption statistics to relevant stakeholders.

3 Our Framework

Council's Fraud and Corruption Control Plan sets out a four-pronged approach to Fraud and Corruption management which is detailed below:

3.1 Prevention:

Council implements appropriate prevention strategies to minimise the risk of Fraud and Corruption.

3.2 Detection:

Council establishes systems of internal control, commissions internal and external audits, implements continuous monitoring, and encourages reporting of any suspected or actual Fraud or Corruption by internal and external personnel, to identify and detect any fraudulent or corrupt conduct.

3.3 Response:

Council enacts the following plan to manage and respond to any suspected cases of fraud or corruption.

- Immediate response procedures are implemented to mitigate any loss to Council.
- Internal and external assessment and investigation procedures are followed.
- Disciplinary measures are taken as necessary.
- Referrals to appropriate bodies.

3.4 Record Keeping:

Council is committed to good record keeping inline with the requirements of the State Records Act.

Council records are collected must be protected, maintained and accessible for their total retention period and must be disposed of in accordance with the State Records Act 1998 and Council's disposal procedures.

Council works to ensure that accurate and confidential records are created and maintained for all internal and external complaints of suspected fraud or corruption. Council keeps a secure register that includes key details of each complaint, the progress of any response, and the status of any recommendations. Council also maintains a register of fraud or corruption events in line with the Fraud and Corruption Control Plan. Where this policy is breached, Council may investigate the matter under relevant policies, including the Code of Conduct. Any suspected criminal behaviour or corrupt conduct will be referred to the appropriate external authority.

4 Roles and Responsibilities

Role	Responsibility
Councillors / Mayor	<p>Councillors are responsible for reporting corrupt and fraudulent conduct in line with Council's Public Interest Disclosures (PID) Policy.</p> <p>Councillors are responsible for behaving in accordance with Council's Code of Conduct and relevant Council policies.</p> <p>In cases of complaints against the General Manager, the Mayor assumes the responsibilities noted below for the General Manager under section 11 of the Independent Commission Against Corruption Act 1988 (ICAC Act).</p>
General Manager	<p>The General Manager has ultimate responsibility for managing fraud and corruption risks within Council.</p> <p>The General Manager is obliged, under section 11 of the (ICAC Act) to report any matter that they reasonably suspect involves or may involve corrupt or fraudulent conduct to the ICAC.</p>
Audit Risk and Improvement Committee (ARIC)	<p>The ARIC advises the General Manager on the adequacy and effectiveness of the council's fraud and corruption prevention framework and activities. Key responsibilities include:</p> <ul style="list-style-type: none"> - Assessing policies, responsibilities, risk-based controls, and processes for prevention, detection, response, investigation, and reporting. - Evaluating employee awareness, third-party systems, information capture, framework reviews, and ICAC/best practice implementation.
Executive Team	<p>The Executive Team are responsible for creating an environment where fraud and corruption is not tolerated, identifying risks of fraud and corruption, supporting organise wide initiatives and taking appropriate action to ensure that controls are in place to prevent and detect fraud.</p>
Manager Governance & Risk	<p>The Manager Governance& Risk is responsible for the provision of fraud and corruption initiatives and ensuring that the Council's Fraud and Corruption Control Policy is fully and effectively implemented.</p>
Managers	<p>Managers are accountable for fraud and corruption control in their areas of responsibility.</p>
Staff	<p>All Staff are responsible for reporting corrupt and fraudulent conduct in line with Council's Public Interest Disclosures (PID) Policy.</p> <p>All Staff are responsible for behaving in accordance with Council's Code of Conduct and Council's adopted policies.</p>
Contractors	<p>All contractors acting on behalf of Council are responsible for reporting corrupt and fraudulent conduct in line with Council's draft Public Interest Disclosures Policy.</p> <p>All contractors are responsible for behaving in accordance with Council's Code of Conduct and relevant Council policies.</p>

Role	Responsibility
Representatives	All representatives of Council are responsible for reporting corrupt and fraudulent conduct in line with Council's Public Interest Disclosures (PID) Policy. All representatives are responsible for behaving in accordance with Council's Code of Conduct and relevant Council policies.

5 DEFINITIONS

TERM	DEFINITION
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.
Corrupt Conduct	This policy uses the same definition as stated in the Independent Commission Against Corruption Act 1988 NSW. 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, involving or affecting a NSW Public Official or public sector organisation.
Council	Bayside Council
Fraud	Deliberate and premeditated activity which involves the use of deception to gain advantage and/or obtain a financial benefit.
Public Official	As defined under the Independent Commission Against Corruption Act 1988 NSW and includes an employee (including contractors, temporary and casual staff) of Bayside Council, any individual that undertakes an official public function on behalf of Bayside Council, and Council committee members.

6 Version history

The following matrix details the version history of the Fraud and Corruption Policy:

Version	Release Date	Author	Reason for Change
1.0	27 May 2026	Risk Specialist	Newly adopted Policy