

Fraud and Corruption Prevention Plan 2020-22

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Fraud and Corruption Prevention Policy Statement

As public servants we are entrusted by both government and the community to deliver services in a competent and ethical manner. Integrity, both as a personal quality and signature behaviour under the ACT Public Service Code of Conduct, must remain foremost in all our activities. Preventing fraud and corruption is the responsibility of all employees and we must act with integrity, professionalism and fairness in all our dealings.

Corruption, fraud, theft, misuse of money, property or information is a significant breach of trust, erodes community confidence and threatens good governance. There is no place in TCCS for those who engage in these types of behaviours. TCCS has a <u>zero-tolerance</u> policy towards fraudulent activity or corrupt behaviour by our employees, contractors, service providers, and its clients.

Preventing fraud and corruption begins with all employees understanding their responsibilities and obligations. To this end, employees are provided with training in ethics and fraud awareness. This is key to employees understanding their duty to immediately report all cases of suspected or committed fraud to their supervisor or directly to the Senior Executive Responsible for Business Integrity Risk (SERBIR).

I am committed to ensuring that reported cases of fraud and corruption are handled in a confidential, prompt and professional manner. I am also committed to eliminating fraud and corruption from our workplace and I, together with my Executive Board colleagues, will continue to provide a significant degree of oversight to achieve this.

The TCCS Governance branch provides practical advice and formal mechanisms for employees to safely report fraud and corruption. The branch also reviews and endorses a comprehensive program of internal audit work and compliance checking to oversee systems, controls and processes in place to provide assurance that efficient financial and operational controls are managing, detecting and preventing fraud and corruption risks. TCCS collaborates across government and externally with ACT Policing and the Integrity Commission, where appropriate, to ensure all reports of corruption and fraud are thoroughly investigated.

The Transport Canberra and City Services Fraud and Corruption Prevention Plan outlines the important activities we must take to minimise opportunities and occurrences of fraudulent behaviour. I look forward to your individual commitment and support in protecting the Directorate against fraud and corruption — and I urge you to read this plan in full. If you are in any doubt about a fraud related issue, I encourage you to contact the Agency Security Advisor (ASA), Governance Branch or alternatively make a submission through TCCS.SERBIR@act.gov.au.

Alison Playford

Director-General

Transport Canberra and City Services

Introduction

Purpose

Under the ACT *Public Sector Management Act 1994* (**PSM Act**) and the *ACT Public Service* (**ACTPS**) *Integrity Policy,* ACT Government Directorates are required to prepare and review a Fraud and Corruption Prevention Plan and fraud risk assessment every two years. The Directorate has prepared this Fraud and Corruption Prevention Plan (the **Plan**) which will assist its employees in the management of fraud and corruption risks. The Plan should be read in the context of the *Transport Canberra and City Services* (**TCCS**) *Strategic Plan* and the *TCCS Risk Management Framework*.

The Fraud and Corruption Prevention Policy Statement (the **Policy Statement**) at the beginning of this document outlines the responsibilities of employees and details the Directorate's position when dealing with suspected fraud and corruption. The Policy Statement, in conjunction with the *ACTPS Integrity Policy*, provides the initial guidance for employees when considering issues of fraud and corruption.

Implementing an effective framework for preventing fraud and corruption is a practical demonstration that the Directorate is committed to exemplifying integrity, professionalism and ethical practices across all facets of the Directorate.

Definition of Fraud and Corruption

Fraud is stealing

For the purposes of this Plan the definitions of fraud and corruption have been adopted from the ACTPS Integrity Policy and the ACT Integrity Commission Act 2018:

Fraud

"Taking or obtaining by deception, money or another benefit from the government when not entitled to the money or benefit or attempting to do so. This includes evading a liability to the government".

The Integrity Commission Act 2018 defines corrupt conduct as -

"Conduct that could constitute a criminal or <u>serious disciplinary</u> offence or reasonable grounds for the dismissal of a public official. This would include any conduct by a public official that:

- Constitutes the exercise of their functions in a way that is dishonest or is not impartial
 or would, if proved, be an offence against the Criminal Code.
- Breaches public trust or is a misuse of information or material acquired by the official while performing their official functions.
- Adversely affects the honest or impartial exercise of functions by a public official or a public sector entity or adversely affects the exercise of official functions.
- Involves collusive tendering, fraud in relations to issuing regulatory licenses and permits, dishonestly benefiting or obtaining the payment of public funds for private advantage, defrauding the public revenue and fraudulently obtaining or retaining employment or appointment as a public official."

Objective

The Directorate recognises that a proactive fraud and corruption prevention plan is an integral part of its governance framework. Consistent with the requirements of the PSM Act, the Directorate will:

- 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 Directorate;
- develop strategies and treatments 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 and reporting of suspected fraud and corruption.

This Plan is integral to supporting the *TCCS Risk Management Framework*. The overall objective of the Plan is to prevent, to the greatest extent possible, all incidents of fraud and corruption within the Directorate. In the event that fraud or corruption does occur, this Plan can be used as a guidance tool and outlines the appropriate response for an occurrence.

Application

The Plan is to be applied by all business unit executives and statutory office holders (where appropriate), but it is the responsibility of all employees to be aware of their obligations with regard to fraud and corruption This Plan will continue to be informed by fraud and corruption risk assessments conducted during the business unit risk review process in accordance with the TCCS Risk Management Framework.

The Plan will be regularly reviewed and updated at a minimum of every two years as required under the *ACTPS Integrity Policy*. This Plan will inform the normal planning process of the Directorate and strategies or specific actions directed to minimising the risk of fraud identified during business planning and development processes.

Review of the Plan

Directorate 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.

Ongoing monitoring of the plan is directed by the *ACTPS Integrity Policy*. The SERBIR will provide regular reports to the Audit Committee and Executive team to demonstrate the implementation and effectiveness of the Plan.

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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. The Directorate has a robust program of internal audit and compliance testing which ensures established controls are effectively operating to prevent and detect fraud.

Fraud and Corruption Prevention Detection

Fraud and corruption represents a significant risk to the delivery of the objectives of the public sector by undermining many aspects of efficiency, effectiveness and integrity. The impact to the reputation of the Directorate resulting from fraudulent or corrupt activity can be significant and long-term.

Two of the most important factors that assist TCCS in the prevention of fraudulent and corrupt activity are:

- establishment and maintenance of a sound ethical tone through adherence to the <u>ACTPS Code</u>
 <u>of Conduct</u>, the ACTPS Integrity Policy, the <u>Integrity Commission Act 2018</u> as well as statutory
 obligations and Directorate core values; and
- awareness and education of the exposures and risks of fraud and corruption at all levels of management.

Fraud and corruption are business risks that are controlled by the application of risk management principles and this Plan is structured to achieve the implementation, continuous monitoring and improvement of controls to manage risk across three themes:

- prevention of fraud and corruption;
- detection of fraud and corruption; and
- monitoring of fraud and corruption.

These themes are at the core of the Fraud and Corruption Risk Assessment process.

Fraud and Corruption Risk Assessments

The fraud and corruption risk assessment will be formally updated every two years or as necessary following significant changes to risk profiles. The update 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 new key risks; and
- identifying new treatment strategies/action plans.

Updated assessments of fraud and corruption risk across the Directorate forms part of the development of this plan and informs control strategies. All risk assessments are conducted in accordance with the ACTPS Integrity Policy, AS/NZS ISO 31000 Risk Management Standard, the AS 8001:2008 Fraud and Corruption Control Standard, and the TCCS Risk Management Framework.

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Building an Ethical Culture

The opportunity for fraud or corruption within an organisation is influenced by the culture and context in which an organisation operates. A number of factors are proven to increase the instances of suspected fraudulent and inappropriate behaviour amongst employees including, but not limited to:

- business units which are geographically dispersed;
- areas where high levels of staff turnover and absenteeism exist;
- areas where individual staff do not take leave for extended periods;
- business areas undergoing frequent corporate change;
- remote working;
- · poor record keeping, particularly around decision making; and
- organisations that have a lack of established policies and procedures related to fraud and corruption prevention.

The Directorate seeks to promote high standards of ethics and integrity across all such areas of the organisation. High standards of professionalism, integrity and work ethics are promoted, instilled and fostered in all Directorate personnel through appropriate recruitment, management and training of all staff. The Directorate has a strong culture of probity and adherence to Public Sector Management values. Strong cultural norms act to reinforce appropriate behaviours.

There are a number of guiding documents supporting signature values and behaviours underpinning existing staff behaviour and also supports the effective recruitment of people who display ethical behaviours. These documents promote and manage ethical behaviour across the ACTPS and the Directorate, and include:

- Public Sector Management Act 1994;
- Public Sector Management Standards 2006;
- ACTPS Code of Ethics;
- ACTPS Code of Conduct;
- ACTPS Integrity Policy;
- TCCS Values and Code of Conduct;
- TCCS Risk Management Framework; and
- TCCS Director-General Financial Instructions.

Staff Awareness and Training

The development and maintenance of an ongoing fraud and ethics awareness program is undertaken by the Agency Security Advisor who facilitates fraud and ethics awareness sessions as part of the TCCS Staff Induction Program as well as tailored sessions for specific business units where there is an identified need. Additionally, Fraud and Ethics Awareness is included as a core module in the Transport Canberra Driver Induction and Driver Continuity Training programs. Staff also have the option to complete Fraud and Ethics Awareness via the eLearning module located on the TCCS Learning

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Management System. The Agency Security Advisor sits within the Governance and Ministerial Services branch and reports to the SERBIR on matters relating to fraud and corruption prevention.

The induction program covers the following areas:

- definitions and examples of fraud, corruption and ethics;
- employee obligations within the ACTPS including the supporting documentation;
- guidance on gifts, benefits and hospitality arrangements and processes;
- record keeping;
- guidance on the declaration of conflicts of interest (both real or perceived);
- guidance on second jobs; and
- processes for reporting fraud.

Additional information sessions on ethics, fraud and corruption are presented across TCCS to increase staff awareness of the importance of understanding the risks, and the requirement that all staff must be actively aware of their personal obligations. Sessions may be delivered in regular branch, section, and team meetings, as well as other relevant gatherings of staff. All staff are provided information on ethics, fraud and corruption and their general obligations as part of the compulsory Directorate induction training.

To ensure staff are actively aware of their obligations, as a minimum staff should complete an awareness session in ethics, fraud and corruption biennially (every two years). Awareness sessions can be completed online through eLearning or attendance at facilitated sessions.

There are a number of documents available to staff which provide information on fraud and corruption issues, including a <u>fact sheet</u> with examples of ethical dilemmas that staff may face. These are available to all staff on the TCCS intranet or by contacting the Governance and Ministerial Services Branch.

Internal Audit and Compliance

The Directorate has a robust program of internal audit and compliance testing which ensures established controls are effectively operating to prevent and detect fraud. The Quality Management System (QMS) establishes and maintains internal controls, systems and procedures to detect and deal with fraud then continually improves on it. Further to this the QMS defines policies, procedures and core processes to implement an effective fraud prevention program.

The internal audit and compliance programs include considerations to high risk areas of fraud and corruption risks focusing on regulatory activities, financial transactions, procurement, record keeping and asset security.

The design, development and maintenance of financial administrative and operational systems, procedures and controls are paramount to the control of financial fraud and will be undertaken at every opportunity ensuring an appropriate audit trail exists. The Governance Branch of TCCS will monitor staff compliance with mandatory awareness and through the TCCS Learning Management System (LMS). This information will be provided to the ASA for reporting requirements.

Responsibilities for the Management of Fraud and Corruption

The Director General

The Director-General is responsible for the corporate governance of the Directorate and has overall responsibility for fraud control and for ensuring compliance with the PSM Act, the PSM Standards, the *Integrity Commission Act 2018* and the *ACTPS Integrity Policy*. The Director-General will:

- foster values based leadership within the Directorate, in particular the value of integrity;
- foster an environment which makes active fraud and corruption control a clearly defined obligation for all TCCS staff;
- articulate clear standards and procedures to ensure the minimisation and deterrence of fraud and corruption;
- ensure the wide dissemination of this plan;
- appoint a Senior Executive Responsible for Business Integrity Risk as SERBIR and provide details of the appointment to the Public Sector Standards Commissioner;
- appoint Disclosure Officers;
- establish procedures for the detection and prosecution of offences should they occur;
- ensure adequate fraud and corruption controls are in place;
- ensure that all staff undertake regular training in fraud and corruption control, ethics and the ACTPS Code of Conduct; and
- report on the implementation of fraud prevention strategies.
- put in place provision for mandatory corruption notifications to the Integrity Commissioner where serious or systemic corrupt conduct is suspected or has occurred.

Senior Executive Responsible for Business Integrity Risks (SERBIR)

The SERBIR is an appointment administered by the Director-General made under section 21 of the PSM Standards. The SERBIR for the Directorate is the Executive Branch Manager, Governance and Ministerial Section and is supported by a panel consisting of the Agency Security Advisor, and the Executive Branch Managers of Legal and Contracts and People and Capability.

Where the delegated SERBIR is unavailable or absent, the Chief Operating Officer will assume the role of SERBIR to ensure business continuity.

The SERBIR will:

- ensure the Directorate has a current fraud and corruption prevention plan and risk assessment in place;
- ensure that the Plan is revised every two years, or more frequently in defined circumstances;
- monitor implementation of the Plan and coordinate any risk treatment strategies;
- Review effectiveness of fraud and corruption prevention measures following significant functional or structural change;
- record all identified instances of fraud and corruption;

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- provide oversight of reported cases of suspected fraud and determine the appropriate course of investigation and actions;
- report to the Director-General and Audit Committee on a regular basis;
- ensure that the most current Plan is brought to the attention of staff through training sessions, intranet, or other media; and
- Act as the primary senior executive point of contact within TCCS for allegations of fraud and corruption and determine how escalated allegations should be handled.
- Act as the primary point of contact for the Integrity Commission and notify the Integrity Commissioner as per the Mandatory Corruption Notification Directions 2019 (No 2) where serious or systemic corrupt conduct is suspected or has occurred.

Agency Security Executive (ASE)

The TCCS Agency Security Executive is the Chief Operating Officer who will:

- foster an environment which makes active fraud and corruption control a clearly defined obligation for all TCCS staff;
- articulate clear standards and procedures to ensure the minimisation and deterrence of fraud and corruption;
- ensure that fraud and corruption risks are a primary consideration in assurance and audit programs which ensures internal and external oversight; and
- assist the Director-General and SERBIR in fulfilling their responsibilities.

Audit Committee

Reporting to the Director-General, the TCCS Audit Committee will:

- provide independent assurance that the directorate is meeting their obligations in respect to integrity and fraud control arrangements, including advising the Director-General of any concerns regarding the management and implementation of integrity and fraud risk strategies; and
- review and monitor the annual audit program focussing on operations, compliance and fraud integrity risks.

TCCS Executive

TCCS Executives (including Deputy Director-Generals) will:

- assist the Director-General, Audit Committee, and SERBIR in fulfilling their responsibilities;
- understand their mandated reporter obligations under the Integrity Commission Act 2018 to report all or suspected occurrences of serious or systemic corrupt conduct to the SERBIR for potential referral to the Integrity Commissioner (this does not preclude any Senior Executive Service level staff member reporting matters directly to the ACT Integrity Commissioner);
- adopt and promote the highest standards of ethical behaviour within the Directorate;
- develop, encourage, insist upon and implement sound financial, legal and ethical decision making within the Directorate;

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- ensure that staff complete fraud, corruption, and ethical conduct awareness sessions at least once every two years;
- promote awareness of fraud and corruption control policies, plans and guidelines;
- ensure each area of their control is subject to a risk assessment and regularly assess the
 potential for breaches of integrity, including theft and corruption. Progress to be reported to
 the SERBIR on a regular basis;
- implement strategies to reduce fraud and corruption risk;
- act as a point of contact for staff reporting fraud or corruption matters and referring the allegations to the SERBIR; and
- Review effectiveness of fraud and corruption prevention measures following a significant functional or structural change.

Agency Security Advisor (ASA)

The Agency Security Advisor will:

- record all instances of fraud and corruption which occur and advise the SERBIR;
- coordinate the delivery of the Directorate's Fraud and Ethics Awareness program;
- monitor the review and/or investigation process in consultation with the People and Capability branch; and
- maintain a record and tracking system to ensure that all instances of suspected fraud and corruption are appropriately documented.

Managers and Employees

All managers and TCCS employees are to:

- 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, and records are kept;
- ensure that staff complete fraud, corruption, and ethical conduct awareness sessions at least once every year;
- 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, or perceived, immediately when the conflict becomes apparent; and
- report any incidents of suspected or actual fraud or corruption immediately suspected or actual fraud and corruption should be reported as soon as possible.

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How to Report Suspected Fraud and Corruption

It is the responsibility of all staff and contractors to act with honesty and integrity at all times 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

It is important that you do not jump to conclusions. Carefully observe and note the suspected conduct and document your own actions. Keep any documents as possible evidence and do not alter them e.g. by marking them and ensuring they are stored securely.

2. Report concerns

Report concerns to your supervisor as soon as possible — do not delay. The sooner you report suspected or actual fraud or corruption, the sooner it can be actioned and dealt with. A delay in reporting can affect the ease with which a matter is investigated and dealt with.

If it is not appropriate to report your concerns to your supervisor, you should report them to the SERBIR, the EBM, People and Capability, the EBM, Legal and Contracts, or the Agency Security Advisor.

The SERBIR is responsible for the initial receipt of information on suspected instances of fraud or corruption. The SERBIR can be contacted through the tccs.serbir@act.gov.au email address.

Persons reporting suspected fraud or corruption may be protected under the provisions of the *Public Interest Disclosure Act 2012*. Further information on Public Interest Disclosure (i.e. whistleblowing) is available in the *TCCS Public Interest Disclosure Guidelines*.

3. Maintain confidentiality

To prevent possible destruction of evidence by those involved in the alleged fraudulent activity that may be 'tipped off', it is important that you only inform those who need to know. This is important as it not only protects the integrity of the investigation process but also protect the rights of a person suspected of fraudulent activity that may in fact be innocent.

4. Recording fraud and corruption matters

The SERBIR is responsible for maintaining an appropriate recording and tracking system to ensure that all instances of fraud and corruption are satisfactorily resolved, and decisions are recorded. This system facilitates the extraction of statistical data for monitoring the effectiveness of the Plan and provides information required to meet annual reporting and other obligations. Accurate and fulsome records are to be kept of all reported suspected fraud and corruption.

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How TCCS will Manage Reports of Suspected Fraud and Corruption

Confidentiality

People who report evidence or suspicions of fraud can be confident that their identity and information will be treated in the strictest confidence, and that unless they are involved in the fraudulent activity, such action will in no way be permitted to adversely affect their position or prospects within the organisation. Indeed, employees 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 a supervisor/manager, through internal review and appeal mechanisms within relevant enterprise agreements, or if necessary, through an appropriate, independent ACT body such as the Ombudsman, the ACT Integrity Commission or the ACT Auditor-General's Office.

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. The SERBIR may appoint an authorised officer within the organisation to undertake enquiries or may acquire the services of external experts to assist in the conduct of any inquiry.

Investigation (Internal and External)

All allegations of fraud or corruption, both internal and external, are assessed and where appropriate, investigated with the aim of proving or disproving the allegations made. The SERBIR and SERBIR panel are guided by a number of potential criteria when determining referrals of suspected fraud or corruption for investigation, these include:

- ACTPS Integrity Policy;
- ACT Integrity Commission Policy 2018;
- ACTPS Standards for the conduct of inquiries and investigation for ACT Agencies;
- Public Interest Disclosure Act 2012; and
- TCCS Public Interest Disclosure Guidelines.

Where appropriate, the SERBIR may determine the need to refer matters to external investigative bodies including a provider from the ACT Administrative Review and Investigations Panel (ARIP), the Integrity Commissioner or the Australian Federal Police.

Reporting

Reporting mechanisms undertaken within the Directorate adhere to the requirements of the ACTPS Integrity Policy and the *Integrity Commission Act 2018* and include:

- annual reporting directions advising on prevention processes, detection of and resolved instances of fraud and corruption;
- SERBIR reports regulary to the Audit Committee and Strategic Executive Board; and
- If, in the opinion of the SERBIR, and in consultation with the TCCS Executive there is an occurrence or suspected occurance of serious or systemic corrupt conduct then there is an mandated obligation to report this conduct to the Integrity Commissioner.

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Mandated Reporting Obligations to the Integrity Commissioner

There is a duty on mandated reporters to carefully consider all information or material that comes to their attention about serious or systemic corrupt conduct. A mandated reporter must not be wilfully blind—intentionally shutting their eyes to the obvious or failing to make further inquiries that an honest, reasonable person would make when confronted with information or material about serious or systemic corrupt conduct. Mandated reporters are required to exercise their judgement and may elect to seek legal advice prior to making a notification.

A mandated reporter must notify the SERBIR as soon as they form a suspicion. The Integrity Commission has detailed the below flowchart which depicts the decision-making process that a mandated reporter may apply in seeking to establish whether or not there is an obligation to make a mandatory corruption notification when faced with certain information or material about a public official's or a public sector entity's conduct.

Does the information that is before you point towards conduct that would fall within the meaning of corrupt conduct for the purpose of section 9 of the IC Act?



Does the information that is before you point towards corrupt conduct that is of such a character that it would:

- be likely to threaten public confidence in the integrity of government or public administration; (see section 10 of the IC Act) or
- reveal a pattern of corrupt conduct? (see section 11 of the IC Act)



Considering both the source and the content of the information that is before you, and all the surrounding circumstances, would a reasonable person confronted with the same information and circumstances form a suspicion that serious or systemic corrupt conduct has occurred or is occurring?



There is a legal obligation to make a mandatory corruption notification.

It is only where each of the three stages are satisfied that a legal obligation on the part of a mandated reporter arises. Where a mandated reporter receives a public interest disclosure under the *Public Interest Disclosure Act 2012* that gives rise to a reasonable supicions that serious or systemic corrupt has occurred or is occuring there is still an obligation to make a notification to the Integrity Commission. Merely because a public interest disclosure has been made this does not relieve the mandated reporting obligation to the Commissioner.

Glossary of Terms

Term	Definition	
ACTPS	ACT Public Service	
AFP	Australian Federal Police	
ARIP	Administrative Review and Investigations Panel	
ASA	Agency Security Advisor	
DPP	Director of Public Prosecutions	
Employees	Persons employed in the ACT Public Service or employed by a territory instrumentality or statutory office and includes permanent, temporary, casual and contracted employees engaged under the <i>Public Sector Management Act 1994</i>	
Executive Team	A management group for the Transport Canberra and City Services Directorate made up of Executive staff reporting to the Transport Canberra and City Services Director-General	
PID Act	Public Interest Disclosure Act 2012	
PID	Public Interest Disclosure	
Policy Statement	The Transport Canberra and City Services Fraud and Corruption Prevention Policy Statement	
PSM Act	The Public Sector Management Act 1994	
PSM Standards	The Public Sector Management Standards 2006	
SERBIR	Senior Executive Responsible for Business Integrity Risk	
TCCS	Transport Canberra and City Services directorate	
The Plan	Transport Canberra and City Services Fraud and Corruption Prevention Plan.	
Serious corrupt conduct	conduct that is likely to threaten public confidence in the integrity of government or public administration in the ACT.	
Systemic corrupt conduct	instances of conduct that reveal a pattern of corrupt conduct in 1 or more ACT public sector entities.	
Suspects on reasonable grounds	The Integrity Commissioner defines 'suspects' as something less than belief but more than idle speculation, based on facts and circumstances that would be sufficient to make a reasonable person suspect that serious or systemic corrupt conduct had occurred or was occurring. However, proof is not necessary, nor is it required that an individual or individuals be identified	

Documents Referenced

Documents have been cited in this plan can be found via the TCCS Intranet or by contacting the Governance team within the Governance and Ministerial Services branch on 6205 3404.

Document	Location
ACTPS Integrity Policy	TCCS Intranet
ACTPS Code of Conduct	TCCS Intranet
ACTPS Code of Ethics	TCCS Intranet
ACTPS Standards for the conduct of inquiries and investigation for ACT Agencies	Please contact the People and Capability branch
AS/NZS ISO 31000:2009 - Risk Management Standard	Please contact the Governance and Ministerial Services branch
AS 8001:2008 - Fraud and Corruption Control Standard	Please contact the Governance and Ministerial Services branch
TCCS Fraud and Corruption Risk Assessment	Please contact the Governance and Ministerial Services branch
Public Sector Management Act 1994	ACT Legislation Register
Public Sector Management Standards 2006	ACT Legislation Register
Public Interest Disclosure Act 2012	ACT Legislation Register
TCCS Director-General Financial Instructions	TCCS Intranet
TCCS Public Interest Disclosure Guidelines	TCCS Intranet
TCCS Risk Management Framework	TCCS Intranet
Integrity Commission Act 2018	ACT Legislation Register
Integrity Commission (Mandatory Corruption Notification) Directions 2019 (No 2)	ACT Legislation Register

Attachment A- Reporting and Investigation Process Flowchart

