

# Fraud and Corruption Control Policy

<b>Title</b>	Fraud and Corruption Control Policy
<b>Policy Number</b>	42
<b>Adopted by</b>	Council
<b>Adopted Date</b>	18 February 2026
<b>Next Review Date</b>	February 2029
<b>Responsible Officer</b>	Chief Executive Officer
<b>Oversight</b>	Audit and Risk Management Committee (ARMC)

## Policy Summary

This policy establishes the framework for the prevention, detection, reporting and management of fraud and corruption within Tiwi Islands Regional Council.

Council adopts a zero-tolerance approach to fraud and corruption and is committed to maintaining high standards of integrity, accountability and transparency in all its activities.

## Policy Objectives

The objectives of this policy are to:

- minimise the risk of fraud and corruption affecting Council
- promote an ethical culture and strong governance practices
- ensure compliance with applicable legislation and recognised standards
- provide clear guidance on reporting, investigating and responding to suspected fraud or corruption
- protect individuals who report concerns in good faith

## Scope

This policy applies to:

- the Chief Executive Officer
- all Council employees
- contractors, consultants and volunteers
- Council committees and local authorities
- any other person or entity engaged in, or dealing with, Council business

## Legislative and Governance Framework

This policy is made under, and must be read consistently with:

- Local Government Act 2019 (NT)
- Local Government (General) Regulations 2021 (NT)
- Local Government (Electoral) Regulations 2021 (NT)
- Independent Commissioner Against Corruption Act (NT)
- Northern Territory Criminal Code
- Australian Standard AS 8001:2021 Fraud and Corruption Control
- Council's Code of Conduct and related governance policies

# Fraud and Corruption Control Policy

## Definitions

- **Fraud** – A dishonest activity causing actual or potential financial or non-financial loss to Council, including theft, deception, falsification of records, misuse of information or abuse of position.
- **Corruption** – Dishonest or unethical conduct by a person in a position of trust, including misuse of authority, conflicts of interest, bribery or improper influence, whether or not the conduct is criminal.
- **Theft** – The dishonest appropriation of Council property or resources with intent to permanently deprive Council of their use.
- **Anti-fraud measures** – Actions taken to prevent, detect, respond to and investigate fraud and corruption.
- **Fraud and Corruption Control Plan** – The operational plan maintained by the Chief Executive Officer that sets out Council’s prevention, detection, investigation and response measures.

## 1. Policy Statement

Council is committed to fostering a culture of honesty, integrity and accountability. Fraud and corruption will not be tolerated under any circumstances.

All persons associated with Council are expected to act ethically and in the best interests of the community. Elected members and senior staff are expected to lead by example.

## 2. Roles and Responsibilities

### 2.1 Council

Council is responsible for:

- adopting and maintaining this policy
- ensuring appropriate governance, risk management and internal control systems are in place
- supporting a culture of integrity and accountability

### 2.2 Chief Executive Officer

The Chief Executive Officer is responsible for:

- implementing and enforcing this policy
- ensuring appropriate systems and internal controls are in place
- authorising investigations into suspected fraud or corruption
- reporting significant matters to the Audit and Risk Management Committee and Council, where appropriate
- referring matters to external authorities where required by law

### 2.3 Audit and Risk Management Committee (ARMC)

The Audit and Risk Management Committee is responsible for:

- oversight of fraud and corruption risks
- monitoring the effectiveness of internal controls
- reviewing significant fraud and corruption matters
- overseeing periodic reviews of the Fraud and Corruption Control Plan
- making recommendations to Council and the Chief Executive Officer

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## 2.4 Managers and Supervisors

Managers and supervisors are responsible for:

- promoting ethical behaviour within their teams
- ensuring internal controls are applied and reviewed
- promptly reporting suspected fraud or corruption

## 2.5 Employees, Contractors and Others

All persons covered by this policy must:

- act honestly and ethically
- report suspected fraud or corruption
- cooperate with investigations
- maintain confidentiality

## 3. Reporting Suspected Fraud or Corruption

Suspected fraud or corruption must be reported as soon as practicable through one of the following channels:

- the Chief Executive Officer
- the Chair of the Audit and Risk Management Committee
- the Independent Commissioner Against Corruption (ICAC NT)

Reports may be made confidentially. No person will be subject to reprisal or disadvantage for making a report in good faith.

## 4. Investigation and Response

All reports will be assessed promptly and treated confidentially. The Chief Executive Officer may:

- conduct an internal investigation
- appoint an authorised internal investigator
- engage an external investigator
- refer the matter to Police, ICAC NT or another appropriate authority

Investigations will be conducted fairly, impartially and in accordance with the law and principles of procedural fairness.

## 5. Prevention and Control Measures

Council will implement measures to reduce fraud and corruption risk, including:

- segregation of duties
- financial and operational controls
- recruitment screening, including referee and criminal history checks where appropriate
- staff training and awareness programs
- internal and external audits

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## 6. Public Reporting

Members of the public may report suspected fraud or corruption involving Council to:

- the Chief Executive Officer
- the Chair of the Audit and Risk Management Committee
- the Independent Commissioner Against Corruption (ICAC NT)

All reports will be recorded and managed in accordance with this policy and applicable legislation.

## 7. Confidentiality

Information relating to reports and investigations will be handled sensitively and disclosed only where lawful and necessary.

## 8. Review and Evaluation

This policy will be reviewed at least every three (3) years, or earlier if there are changes to legislation, governance requirements or identified risks.

The review will be coordinated by the Chief Executive Officer with oversight from the Audit and Risk Management Committee.

## 9. Superseded Policy

Policy 42 – Fraud Protection Policy (Reviewed May 2018) was revoked by Council resolution OCM/45 on 11 November 2024.

This policy (Fraud and Corruption Control Policy) was adopted by Council resolution OCM/255 on 18 February 2026 and now governs fraud and corruption control within Tiwi Islands Regional Council.

## 10. Version Control

Version	Resolution No.	Adopted Date	Description	Responsible Officer
1.0	OCM/255	18-Feb-2026	New Fraud and Corruption Control Policy replacing 2018 Fraud Protection Policy	Chief Executive Officer

*Minor administrative updates (such as formatting, contact details or legislative reference updates) that do not alter policy intent may be approved by the Chief Executive Officer and recorded in the version control table.*