



# *Burwood Council*

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## **FRAUD AND CORRUPTION PREVENTION ACTION PLAN**

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## Statement

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Burwood Council is committed to a work environment that is resistant to fraud and corruption and is dedicated to implementing effective measures to minimise fraud and corruption risks.

Burwood Council does not tolerate fraudulent or corrupt behaviour and will take appropriate action against Council Officers, contractors and elected members who have participated in such behaviour, and those who allowed it to occur.

## Purpose

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The Fraud and Corruption Prevention Action Plan demonstrates the commitment of the Mayor, Councillors, General Manager, Executive Team and Management to combat fraud and corruption.

The Plan links to Council's Fraud and Corruption Prevention Policy, and it details Council's approach to the deterrence and detection of fraudulent and corruption behaviour, providing strategies to assist managers and officers to meet their fraud and corruption prevention responsibilities.

The Plan and the control framework are modelled on *Standards Australia AS8001-2008 Fraud and Corruption Control* and it follows the ten attributes of fraud control contained in the *NSW Auditor-General Better Practice Guide Fraud Control Improvement Kit*.

## Scope

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The Fraud and Corruption Prevention Plan applies to:

- Councillors
- Council Officers
- Contractors working for Burwood Council
- Other people who perform public official functions on behalf of Burwood Council, such as volunteers

## Definitions

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Fraud - Council has adopted the definition of fraud contained in the Australian Standard 8001-2008 on fraud and corruption control, which defines it as:

Dishonest activity causing actual or potential financial loss to any person or entity including theft of moneys or other property by employees or persons external to the entity and where deception is used at the time, immediately before or immediately following the activity.

This also includes the deliberate falsification, concealment, destruction or use of falsified documentation used or intended for use for a normal business purpose or the improper use of information or position for personal financial benefit.

**Corruption** – corruption and corrupt conduct are defined in the *ICAC Act 1988* (Sect 7, 8, 9) as:

- conduct of a person (whether or not a public official) that adversely affects, or could affect the honest and impartial exercise of public official functions, or
- conduct of a public official that involves the dishonest or partial exercise of any of his or her public official functions, or
- a breach of public trust, or
- the misuse of information or material acquired in the course of a public official's functions

Additionally, corrupt conduct can also be the conduct of any person (whether or not a public official) that adversely affects or could affect the exercise of official functions and involves conduct

such as bribery, blackmail, fraud, forgery and various other crimes.

For conduct to be corrupt it must be covered by one of the conditions above and also any one of the following:

- a criminal offence
- a disciplinary offence
- a situation where there are reasonable grounds for dismissal or dispensing or terminating the Councillor or a public official

## Control Framework

The Plan follows the NSW Audit Office's ten-point strategic management model for fraud and corruption control.

The model has ten attributes, as follows:

<b>POLICY AND PLANNING</b>	1. Integrated Macro Policy 2. Responsibility Structures
<b>PREVENTION</b>	3. Fraud and corruption risk assessments 4. Employee awareness 5. Councillor awareness 6. Customer, community and supplier awareness
<b>DETECTION</b>	7. Internal reporting systems 8. External reporting systems 9. Detection systems
<b>RESPONSE</b>	10. Investigation systems 11. Conduct and disciplinary systems

### 1. Integrated Macro Policy

This strategy aims at ensuring Council has in place the necessary policies, corporate practices, procedures and systems to minimise the risk of fraud and corruption in all areas.

These policies, corporate practices, procedures and systems must be proportionate and specific to the fraud and corruption risks faced by Council, and are considered together to form an integrated range of control measures.

#### Objectives

The objectives of this strategy are to ensure that Council has in place the necessary policies, corporate practices, systems and procedures to minimise fraud in all places, and at all levels, and that those policies, systems and procedures respond, and are proportionate, to the fraud risks faced by the Council.

#### Actions

- 1.1 Policies, corporate practices, systems and procedures to be based on assessed fraud and corruption risks
- 1.2 Policies, corporate practices, systems and procedures updated every 2 years
- 1.3 The Internal Ombudsman will be responsible for coordinating the development, implementation and review of clearly identifiable and functionally integrated fraud and corruption control policies.

Policy development and review might involve consultation with Organisation Development, Internal Audit, Risk Management Committee, Executive Team, the Policy, Corporate Practice and Procedures Panel and Council.

## Deadlines

<b>Document Name Adopted/Approved Date</b>	<b>Action</b>	<b>Completion Date</b>	<b>Council Officer Responsible</b>
Code of Conduct – 12 February 2014	Review every 4 years or if there are changes to legislation	Review to be undertaken by January 2018	Governance Co- ordinator
Fraud and Corruption Prevention Policy – 23 July 2013	Review every 4 years	Review to be undertaken by June 2017	Internal Ombudsman
Fraud and Corruption Prevention Plan	Review every 2 years	Bi-annually	Internal Ombudsman
Internal Ombudsman Policy – 26 June 2012	Review every 4 years	Review to be undertaken by May 2016	Internal Ombudsman
<i>Public Interest Act 1994 - Internal Reporting Policy – 23 March 2015</i>	Review every 2 years	Review to be undertaken by February 2017	Governance Co- ordinator
Public Interest Disclosures – Procedure for Assessing Disclosures and Investigations – 23 March 2015	Review every 4 years	Review to be undertaken by February 2019	Governance Co- ordinator
Complaints Management Policy – 17 February 2014	Review every 4 years	Review to be undertaken by February 2018	Internal Ombudsman
Statement of Business Ethics – 25 March 2013	Review every 4 years	Review to be undertaken by February 2017	Governance Co- ordinator
Discipline and Formal Warning Corporate Practice – 25 June 2012	Review every 4 years	Review to be undertaken by May 2016	Manager Organisation Development
Discrimination, Harassment and Bullying Corporate Practice and Grievance Procedures - 15 September 2014	Review every 4 years	Review to be undertaken by December 2015	Manager Organisation Development

## 2. Responsibility Structures

It is important that all Council Officers are aware of their role in implementing and monitoring an effective fraud and corruption control system, and this strategy ensures there are clear lines of accountability and responsibility.

### Objectives

The objectives of this strategy are to ensure that there is clear accountability and responsibility for implementation and monitoring of the Fraud and Corruption Prevention Plan.

Most importantly, this strategy aims at formalising the common understanding that everyone in the Council has a key role to play in effective fraud and corruption control management.

### Actions

- 2.1 Position descriptions to have appropriate fraud and corruption control elements incorporated.
- 2.2 Council's Fraud and Corruption Prevention Policy to detail accountability and responsibility structures.
- 2.3 The Internal Ombudsman will be responsible to the General Manager for the:
  - 2.3.1 Co-ordination of Council's response to fraud and corruption
  - 2.3.2 Co-ordination of Council's approach to fraud and corruption prevention and detection

### Deadlines

Document Name Adopted/Approved Date	Action	Completion Date	Council Officer Responsible
New position descriptions	Inclusion of fraud and control elements	1 August 2015	Manager Organisation Development
Current position descriptions	Inclusion of fraud and control elements	1 September 2015	Manager Organisation Development
Fraud and Corruption Prevention Policy – 23 July 2013	Review every 4 years	Review to be undertaken by June 2017	Internal Ombudsman
	Co-ordination Council's response to fraud and corruption	On-going	Internal Ombudsman

## 3. Fraud and Corruption Risk Assessment

This strategy ensures that Council undertakes regular fraud and corruption risk assessments.

The assessments may include a combination of in-house solutions (self-assessment questionnaires) as well as targeted audits conducted by the Internal Ombudsman, the Internal Auditor or an external investigator.

In accordance with the NSW Audit Office's Better Practice Guidance, these fraud and corruption risk assessments are to be undertaken at least once every two years.

### Objectives

The objectives of this strategy are to ensure:

- Regular fraud and corruption risk assessments are undertaken by the Council.
- The fraud risk assessments quantify the level, nature and form of the risks to be managed.
- Actions will be taken by the Council to mitigate the risks identified in the fraud risk assessments.

### Actions

- 3.1 Fraud risk assessments to be undertaken separately from general risk management exercises.
- 3.2 The Internal Ombudsman to ensure that a Council wide fraud and corruption risk self-assessment is undertaken (at least) every two years.

- 3.3 Fraud and Corruption risk self-assessment to cover internal and external operating environments.
- 3.4 Fraud and corruption risk mitigation actions to be assigned to individual members of management and/or Council Office for action.
- 3.5 Ensure that Council maintains a Fidelity Guarantee Policy that provides for loss or damage in the case of fraud being committed on the organisation.

#### Deadlines

Document Name Adopted/Approved Date	Action	Completion Date	Council Officer Responsible
	Organisational Fraud and Corruption Risk Self-Assessment	1 July 2015	Internal Ombudsman
	Fraud and corruption risk assessment workshops	Yearly from 1 August 2015	Internal Ombudsman
	Attainment of a Fidelity Guarantee Insurance Policy	Ongoing	Manager Organisation Development

#### 4. Councillor Awareness

It is paramount that Mayor and Councillors understand the ethical behaviour required of their position, and that training programs are in place on ethics and fraud and corruption risks.

#### Objectives

The objectives of this strategy are to ensure:

- All Councillors understand the ethical behaviours required of their position.
- Training programs on ethical behaviour are in place for Councillors.
- Training deals with the fraud and corruption risks faced by Councillors in the exercise of their elected members' duties

#### Actions

- 4.1 Code of Conduct, Conflicts of Interest, Gifts and Benefits, delegations training to be included in Council induction programs for newly elected Councillors.
- 4.3 Public Interest Disclosure (PID) training to be delivered to Councillors.

#### Deadlines

Document Name Adopted/Approved Date	Action	Completion Date	Council Officer Responsible
	Councillor induction training to include Code of Conduct, Conflicts of Interest, Gifts and Benefits and delegations	30 September 2016	Deputy General Manager Corporate, Governance and Community Services
Councillor Induction Manual – August 2012	Review every four years	1 August 2016	Governance Co-ordinator
	Public Interest Disclosures training (NSW Ombudsman	30 September 2016	Internal Ombudsman

Document Name Adopted/Approved Date	Action	Completion Date	Council Officer Responsible
	training modules)		

## 5. Employee Awareness

It is paramount that all employees understand the ethical behaviour required of them in the workplace, and that training programs are in place on ethics and fraud and corruption risks.

### Objectives

The objectives of this strategy are to ensure:

- All employees understand the ethical behaviours required of them in the workplace.
- Training programs on ethical behaviour are in place across the Council.
- Training deals with the fraud and corruption risks faced by individuals in their workplace

### Actions

- 4.1 The Internal Ombudsman to ensure ongoing training for all employees in fraud and corruption risk.
- 4.2 Code of Conduct, Conflicts of Interest, Gifts and Benefits, delegations training to be included in Council induction programs for newly appointed Council Officer include temps, contractors etc. An online training program to be implemented for all Council Officers.
- 4.3 Public Interest Disclosure (PID) training to be delivered to PID officers and general PID awareness programs for all Council Officers.
- 4.4 Introduction of "Line in the Sand" newsletter to highlight emerging risk issues with all Council Officers.
- 4.5 Emails from the General Manager highlighting policy changes and updates and providing links on the intranet to key fraud and corruption prevention policies.
- 4.6 Preparation of best practice guides for particular areas of activity, to assist employees and line managers to identify improvements and controls needed to operational practices.
- 4.8 Training to target specific high-risk areas of the Council and focus on changing patterns of behaviour, which put the Council at risk.
- 4.9 Council Officers to be surveyed periodically to provide an organisational health check on the level of fraud awareness and ethical culture across Council.

### Deadlines

Document Name Adopted/Approved Date	Action	Completion Date	Council Officer Responsible
	Induction training to include Code of Conduct	Ongoing	Manager Organisation Development
	Code of Conduct, Conflicts of Interest, Gifts and Benefits, delegations e-learning for all Council Officers	Annually – commencing September 2015	Deputy General Manager Corporate, Governance and Community Services
	Public Interest Disclosures training (NSW Ombudsman training modules)	Annually	Internal Ombudsman
	Induction training to include Public Interest Disclosures (NSW	Ongoing	Manager Organisation Development



Document Name Adopted/Approved Date	Action	Completion Date	Council Officer Responsible
	Ombudsman training modules)		
	"Line in the Sand" newsletter	Distribution every three weeks - commencing August 2015	Internal Ombudsman
	Emails from General Manager and recorded in Council's document management system	As required	General Manager
	Fraud Risk Training – as part of the fraud and corruption risk assessment workshops	Ongoing	Internal Ombudsman
	Council Officers Fraud and Corruption Prevention Self-Assessment	July 2015	Internal Ombudsman – Co-ordination  All Council Officers – self assessment

## 6. Customer, Community and Supplier Awareness

This strategy ensures that customers, the community and suppliers understand that the Council will not accept fraudulent or corrupt behaviour in its dealings, and to ensure they are aware of the consequences of such fraudulent or corrupt behaviour.

### Objectives

The objectives of this strategy are to ensure:

- Customers, the community and suppliers understand that the Council will not accept fraudulent dealings/ transactions.
- Customers, the community and suppliers are aware of the consequences of fraudulent dealings/transactions.

### Actions

- 6.1 Referring to fraud and corruption prevention initiatives in Council's Annual Report.
- 6.2 Procurement Information Packs are to be distributed upon engagement of consultants, contractors and/or suppliers. Packs include:
  - Supplier Information Form
  - Statement of Business Ethics
  - Code of Conduct
  - Work, Health and Safety Corporate Practice
  - Fraud and Corruption Prevention Policy
  - Social Media Policy
- 6.3 Council's Doing Business with Council website page is current and Statement of Business Ethics is available on this page.
- 6.4 Internal Ombudsman to provide information on corruption and fraud prevention to community members and business stakeholders when necessary.

## Deadlines

Document Name Adopted/Approved Date	Action	Completion Date	Council Officer Responsible
Annual Report – November 2014	Preparation of	1 November 2015	Executive Manager
Statement of Business Ethics – 25 March 2013	Review every 4 years	Review to be undertaken by 28 February 2017	Governance Co-ordinator
	Distribution of Statement of Business Ethics	Ongoing	Procurement Officer
	Community awareness on Statement of Business Ethics	Ongoing	Procurement Officer
	Procurement Information Packs	Reviewed annually	Procurement Officer
	'Doing Business with Council' website page	Reviewed annually	Procurement Officer
	Letter from Internal Ombudsman to community members or business stakeholders, inclusive of "Bribery=Crime" flyer from the ICAC (available in multiple languages)	As required	Internal Ombudsman

## 7. Reporting Systems (internal)

Under the *Public Interest Disclosures Act 1994*, Council must have a policy and procedures in place to encourage the reporting of wrongdoing, to endeavour to protect the identity of whistle-blowers and to prevent any reprisal against them.

### Objectives

The objectives of this strategy are to ensure:

- Policies, systems and procedures are in place to encourage the reporting of wrongdoing and suspect behaviour.
- Fraud notification systems give the complainant the opportunity to report wrongdoing or suspect behaviours anonymously.
- Whistle-blowers are protected by the organisation.
- Policies, corporate practices, systems and procedures allow Council officers, managers as well as contractors, consultants, customers, to notify the organisation of wrongdoing and suspect behaviours.

### Actions

- 7.1 Council's Internal Reporting Policy to provide guidance to Council Officers on how to make a protected disclosure and to whom it can be made.
- 7.2 Training on Public Interest Disclosures to be delivered to new employees as part of regular induction programs.
- 7.3 Refresher training on Public Interest Disclosures to be delivered to all Council Officers yearly via online training modules or workshops.
- 7.4 Half-yearly reports on PID activity to be lodged with the NSW Ombudsman.

7.5 Where possible, conduct interviews with whistle-blowers at the end of an assessment/investigation process, to gauge satisfaction with the actions taken by the organisation to resolve their concerns about wrongdoing or suspect behaviours.

### Deadlines

Document Name Adopted/Approved Date	Action	Completion Date	Council Officer Responsible
<i>Public Interest Act 1994 - Procedure for Assessing Disclosures and Investigations Previously Known As - Protected Disclosure Guidelines – Assessing disclosures and Investigations</i>	Every four years	Review to be undertaken by 28 February 2019	Governance Co-ordinator
Public Interest Disclosures - Internal Reporting Policy – <i>Protected Disclosures Act 1994</i>	Every two years	Review to be undertaken by 28 February 2017	Governance Co-ordinator
	Refresher training on PID to be delivered	Annually – April/June each year	Internal Ombudsman
	Half yearly report on PID activity	December and June each year	Internal Ombudsman
	Feedback system on PID handling	Ongoing	Internal Ombudsman

## 8. Reporting Systems (external)

In addition to Council's internal systems, reporting can also be made to a number of external investigative authorities, as follows:

- The NSW Independent Commission Against Corruption (ICAC) — for corrupt conduct;
- The NSW Ombudsman — for maladministration
- The NSW Office of Local Government — for serious and substantial waste in local government
- The NSW Information Commissioner — for disclosures about a government information contravention
- The NSW Police Force – for criminal matters

Individuals wishing to give notice of fraudulent or corrupt behaviour to an external investigating authority need to do so in accordance with any relevant policies, procedures and guidelines.

Under Section 11 of the *ICAC Act 1988* the General Manager is required to report actual or suspected corrupt conduct to the Independent Commission Against Corruption.

### Objectives

The objectives of this strategy are to ensure:

- Council's policies clearly outline the possibility for reports to be made to an external investigative agency
- External notifications take place as required in light of the above legal and policy requirements.

## Actions

- 8.1 Council's Internal Reporting Policy and Fraud and Corruption Prevention Policy include provisions explaining that report can also be made to an external investigative agency.
- 8.2 Council's Internal Reporting Policy and Fraud and Corruption Prevention Policy include provisions for the mandatory reporting by the General Manager to the ICAC of any actual or suspected corrupt conduct, as per Section 11 of the *ICAC Act 1988*.

## Deadlines

Document Name Adopted/Approved Date	Action	Completion Date	Council Officer Responsible
<i>Public Interest Act 1994 - Procedure for Assessing Disclosures and Investigations Previously Known As - Protected Disclosure Guidelines – Assessing disclosures and Investigations</i>	Every four years	Review to be undertaken by 28 February 2019	Governance Co-ordinator
Public Interest Disclosures - Internal Reporting Policy – <i>Protected Disclosures Act 1994</i>	Every two years	Review to be undertaken by 28 February 2017	Governance Co-ordinator
Fraud and Corruption Prevention Policy – 23 July 2013	Review every 4 years	Review to be undertaken by June 2017	Internal Ombudsman
	Report any actual or suspected corrupt conduct to the Independent Commission Against Corruption under Section 11 of the <i>ICAC Act 1988</i>	As required	General Manager
	Report any actual or suspected corrupt conduct by the General Manager to the Independent Commission Against Corruption under Section 11 of the <i>ICAC Act 1988</i>	As required	The Mayor

## 9. Detection Systems

This strategy ensures that there are adequate detection systems to monitor data and identify irregularities and warning signals. In addition to management's own monitoring and review, Council has established a plan of risk based internal audits. These internal audits provide assurance on the effectiveness of internal controls established by management including those to prevent and detect fraud and corruption.

### Objectives

The objectives of this strategy are to ensure:

- Available data is thoroughly monitored and reviewed to ensure that irregularities and warning signals are picked up at a very early stage and flagged for further detailed review.
- Audits regularly examine samples of medium and high risk financial decision making across the organisation.
- Outcomes of audits are reported to the Executive Team and to the Audit Committee on a regular basis.

### Actions

- 9.1 Training to be provided to managers on how to monitor and review available data to ensure that irregularities and warning signals are picked up at a very early stage and flagged for further detailed review.
- 9.2 Implement regular fraud and corruption risk audits to examine a sample of medium and high risk decision processes across Council.
- 9.3 Fraud and Corruption investigation functions to employ data mining and forensic review tools.
- 9.4 Investigation and fraud risk report recommendations are followed up.

### Deadlines

Document Name Adopted/Approved Date	Action	Completion Date	Council Officer Responsible
	Fraud and Corruption detection training for managers	Annually – commencing August 2015	Internal Ombudsman
Annual Internal Audit Plan – 26 May 2015	Include reviews of processes deemed as medium/high risk in Council’s Enterprise Risk Register.	Annually	Internal Auditor
	Follow up assessments of recommendations to be scheduled until satisfactory standards are achieved	As required	Internal Auditor

## 10. Investigation Systems

This strategy ensures that policies, corporate practices and procedures are in place to ensure that investigations, whether conducted internally or outsourced, should be consistent with commonly used investigation standards.

### Objectives

The objectives of this strategy are to ensure:

- Procedures and other appropriate support (including training, where required) are provided to Council Officers undertaking investigation activity on behalf of Council.
- Investigation actions undertaken are consistent with commonly used investigation standards
- Where appropriate expertise is not available internally, then external assistance should be sought in line with Council’s Code of Conduct Administration Procedures.
- All investigations consider what improvements can be made to policies, corporate practices, systems and procedures within the organisation.

- All investigation reports are referred to the General Manager, unless they relate to the General Manager.
- All investigation reports affecting the General Manager are referred to the Mayor and Council.
- Actions from recommendations identified in the investigation reports are referred to the relevant Executive member for implementation, when necessary and appropriate.
- A summary of improvement actions originated from investigations is presented to the Audit Committee for information.

### Actions

- 10.1 Responsibility for the co-ordination of investigations within the Council to lie with the Internal Ombudsman, who will report to the General Manager, unless the investigation related to the General Manager.
- 10.2 The General Manager is responsible for authorising an investigation and ensuring that external investigative agencies, such as the ICAC are appropriately notified, when required.
- 10.3 If the General Manager is the subject of the investigation, the Mayor will be responsible for authorising any investigation (consistent with the Procedure for the Administration of the Code of Conduct or the *Public Interest Act 1994 – Procedure for Assessing Disclosures and Investigations*).
- 10.4 Investigations to use appropriate and legal data gathering and analysis mechanisms to come to valid conclusions. (see *Public Interest Act 1994 – Procedure for Assessing Disclosures and Investigations*).
- 10.5 Actions from recommendations identified in the investigation reports are referred to the relevant Executive member for implementation, when necessary and appropriate.
- 10.6 A summary of improvement actions originated from investigations is presented to the Audit Committee for information, where appropriate.

### Deadlines

Document Name Adopted/Approved Date	Action	Completion Date	Council Officer Responsible
	Referral to external investigative agency	As required	General Manager
	Reports to Audit Committee	As required	Internal Ombudsman

## 11. Conduct and Disciplinary Systems

It is important that all Council Officers understand that fraud and corruption will not be tolerated by the Council, and those found to have engaged in such conduct will face disciplinary action. The Council expects that all Council Officers will act in an ethical manner and in accordance with the standards of behaviour set out in the Code of Conduct.

### Objectives

The objectives of this strategy are to ensure that:

- all Council Officers understand that fraud and corruption will not be tolerated and that perpetrators will face disciplinary action.
- all Council Officers have access to written information to assist them understand their ethical obligations.
- approaches will be developed that are consistent with both perceived risks and the Council's approach to human resources management.

## Actions

- 11.1 Information about fraud and corruption prevention is circulated to all Council Officers via internal communications methods.
- 11.2 Council Officers are informed of disciplinary consequences via the Discipline and Formal Warning Corporate Practice.
- 11.3 When action is required, a decision will be made as per Council's Discipline and Formal Warning Corporate Practice and relevant employment agreement and legislation.
- 11.4 In addressing the outcomes of investigations, a clear and consistent approach is adopted to ensure that fair and consistent penalties are applied where behaviour is found to be corrupt or fraudulent.
- 11.3 The decision to impose disciplinary action lies with the General Manager, following consultation with the Manager Organisation Development and the Internal Ombudsman.
- 11.4 The decision to impose disciplinary actions against the General Manager lies with the Mayor and Councillors.

## Deadlines

Document Name Adopted/Approved Date	Action	Completion Date	Council Officer Responsible
Discipline and Formal Warnings Corporate Practice – 25 June 2012	Review every 4 years	Review to be undertaken by 1 June 2016	Manager Organisation Development
	"Line in the Sand" newsletter	Distribution every three weeks - commencing July 2015	Internal Ombudsman
	Emails from General Manager and recorded in Council's document management system	As required	General Manager
	Investigation records and outcome reports saved in TRIM	As required	Internal Ombudsman
	Decision to impose disciplinary action against the General Manager	As required	The Council

## Related Information

### Legislation

- *Local Government Act 1993*
- *Local Government (General) Regulations 2005*
- *Crimes Act 1900*
- *Independent Commission Against Corruption Act 1988*
- *Public Interest Disclosures Act 1994*
- NSW Audit Office Fraud Control Guidelines
- Australian/New Zealand Standard on Risk Management
- *Workplace Video Surveillance Act 1998*
- *Ombudsman Act 1974*
- *Public Finance and Audit Act 1983*
- *Police Integrity Commission Act 1996*
- *Government Information (Public Information) Act 2009*

## **Burwood Council Documents**

- Council Charter
- Code of Conduct
- Procedures for the administration of the Code of Conduct
- Fraud and Corruption Prevention Policy
- Internal Ombudsman Policy
- Discipline and Formal Warning Corporate Procedure
- Risk Management Plan
- Internal Audit Committee Charter
- Burwood Council Internal Audit Charter
- Discrimination, Harassment, Bullying Policy Corporate Practice and Grievance Procedures
- Discipline and Formal Warnings Corporate Practice
- Burwood Council Public Interest Disclosures – Internal Reporting Policy – *Protected Disclosures Act 1994*
- Procedure for Assessing Public Interest Disclosures and Investigations
- Conflicts of Interests Policy
- General Managers' Delegations by Exception
- Sub-delegations to Council Officers from the General Manager
- Gift and Benefits Policy
- Complaints Management Policy
- Complaints Management Procedure
- Employee's Handbook
- Training and Development Corporate Practice

## **Review**

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The Internal Ombudsman will conduct a review of Council's Fraud and Corruption Prevention Plan every two years.

## **Contact**

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Internal Ombudsman – 9911 9808