

Health and Community Services Directorate

Fraud and Corruption Control Plan 2026-28

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Acknowledgement of Country

The Health and Community Services Directorate acknowledges the Ngunnawal people as traditional custodians of the ACT and recognise any other people or families with connection to the lands of the ACT and region.

We respect the Aboriginal and Torres Strait Islander people, particularly our Aboriginal and Torres Strait Islander staff, and their continuing culture and contribution they make to the Canberra region and the life of our city.

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Contents

Policy Statement	4
Purpose	5
Definition of Terms	5
Roles and Responsibilities	6
Approach.....	9
Prevention.....	9
Detection	12
Reporting	12
Investigation	14
Records Management.....	14
Evaluation.....	14
Review Date	14
Version Control	15
Annexure A - Flowchart of reporting and investigation of fraud and corruption.....	16
Annexure B - Definition of corrupt conduct in the <i>Integrity Commission Act 2018</i>	17

Policy Statement

All ACT Public Service (ACTPS) Directorates and their employees must promote integrity and prevent misconduct including fraud and corruption.

As public servants, the community expects us to act with integrity, to protect the resources and information we are entrusted to hold and to exercise our authority in an ethical and accountable manner. To meet these expectations and maintain the public's trust, the Health and Community Services Directorate (HCSD) is committed to upholding the ACT Public Sector Values with a culture that has zero tolerance for fraud and corruption.

To enable this, we promote a culture of learning, disclosure, transparency and accountability, where it is safe to learn from genuine mistakes and raise questions and concerns.

The ACTPS Integrity Framework (Integrity Framework) consolidates the key standards of conduct and accountabilities that apply to ACTPS Directorates and their employees. Under the Integrity Framework and under the *Public Sector Management Standards 2006*, Directorates are required to develop and implement a Fraud and Corruption Control Plan (the FCC Plan). HCSD's FCC Plan is a core component of our overarching governance structures that support our business and ensure that public resources are professionally managed. The FCC Plan demonstrates our commitment through the development, implementation and regular review of a range of fraud prevention and detection strategies. The prevention and detection strategies are allocated to the HCSD's fraud and corruption risk profiles.

Instances of fraud and corruption detected or reported will be investigated and actioned appropriately.

All employees, including contractors, are required to actively model and uphold the values of the ACT Public Service and ensure fraud and corruption prevention strategies are adhered to, and report suspicious activities to either a Manager, the Senior Executive Responsible for Business Integrity Risk (SERBIR), an Executive Branch Manager, an Executive Group Manager, a Deputy Director-General, myself or the ACT Integrity Commission.

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

I encourage everyone to read and familiarise yourself with this plan to support us in meeting HCSD's commitment of zero tolerance for fraud and corruption.



Kareena Arthy

Director-General
Health and Community Services Directorate

Purpose

Under the ACT *Public Sector Management Act 1994* and the ACTPS Integrity Governance Policy, ACT Government Directorates and Agencies are required to adopt an active preventative strategy towards the control of all breaches of integrity, including fraud and corruption.

The HCSD has prepared the FCC Plan to demonstrate commitment to integrity and professional practices by defining the planned approach to preventing, detecting and reporting suspected fraud and corruption.

Fraud risk management forms part of the business planning cycle and contributes to business performance through minimisation of the Directorate's risks. It provides senior management and the Audit and Risk Management Committee with evidence that fraud risk management is actively occurring within the Directorate. In this regard, the Plan should be read in the context of the Directorate risk management framework.

Definition of Terms

The FCC Plan is intended to align with Part 2.3 (Fraud and Corruption) of the *Public Sector Management Standards 2006 (repealed)* ('the Standards'), ACTPS Integrity Governance Policy, ACTPS Integrity Framework, and requirements of ACT Integrity Commission. It is noted that *the Standards* contains unique definitions.

The Standards define the key terms of corruption, fraud and integrity as follows:

Fraud – means 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 government.

Corruption – means that the officer or employee seeks, obtains, or receives any benefit, other than lawful salary and allowances, on the understanding that the officer or employee will do or refrain from doing anything in the course of their duties or will attempt to influence any other officer or employee on behalf of any person.

Corruption is also defined in the *Integrity Commission Act 2018* and is outlined in Annexure B.

Integrity – means the exercise of authority in accordance with the stated values and principles of the ACTPS and includes the control of fraud and corruption.

Examples of fraud include:

- theft of money (e.g. cash, cheques, EFTPOS, etc.), assets and resources from the Directorate, clients or client accounts
- unapproved use of petty cash, credit/fuel cards and the Directorate's fleet vehicles
- overstating working hours, or orchestrating call-outs, to claim benefits such as overtime and flex leave, or misuse of sick and personal leave
- claiming an allowance when not eligible, e.g. travel, meals and higher duties allowances
- unauthorised use of Directorate facilities and time to operate a personal business
- submitting false claims for reimbursement, including payment for goods / services not received
- releasing information to deceive, mislead or conceal wrong-doings
- destruction or manipulation of records/documents for personal (including financial) gain.

Examples of corruption include:

- manipulating a tender process, or not adhering to relevant procurement policies and guidelines to achieve a desired outcome
- misusing knowledge, power, information or resources of their position for personal gain
- receiving personal benefits in exchange for assisting a supplier or consultant
- not disclosing and/or allowing a conflict of interest to obtain a preferred outcome, including providing benefits to other parties
- manipulation of recruitment processes to provide benefits to staff who are not entitled to them.

Roles and Responsibilities

All staff have an ongoing responsibility to ensure the efficient and effective use of public monies and assets. Specific responsibilities for fraud and corruption control within HCSD are allocated to a range of roles as detailed below:

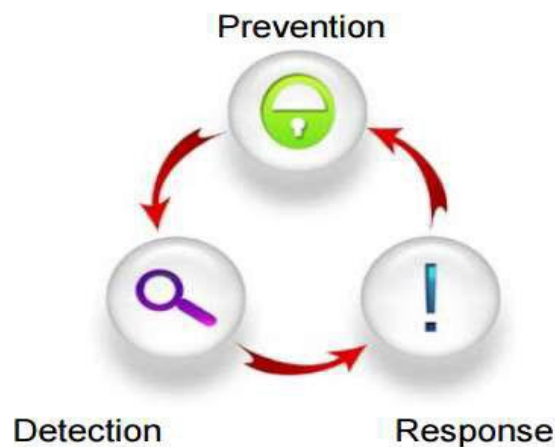
Responsible Party	Responsibilities
Director-General	• establish and maintain a risk management framework and FCC Plan for the Directorate • review the FCC Plan every two years, or more frequently following significant threats or significant organisational changes such as the replacement of a major business system or major organisational restructure • pursue opportunities to actively detect fraud and corruption, mindful of privacy laws and cost efficiencies • assign responsibility to a Senior Executive for the implementation of strategies to promote business integrity, including processes for the detection and investigation of fraud and corruption • ensure that cases of detected or notified fraud and corruption are investigated and reported or referred to the appropriate agency • include information on the fraud and corruption prevention plan in the Annual Report to the Minister including: ○ the assessment of risks to the integrity of the Directorate has been conducted according to the Risk Management Standard and ACT Risk Management Policy (and Implementation Guide) 2023 ○ whether the FCC Plan has been reviewed ○ other fraud prevention strategies adopted ○ fraud awareness training ○ the number of reports or allegations of fraud or corruption received and investigated and action taken and outcomes of investigations.

Responsible Party	Responsibilities
Senior Executive Responsible for Business Integrity Risk (SERBIR)	- regularly report on the Directorate's overall compliance with the ACTPS Integrity Governance Policy to the Director-General and the Audit and Risk Management Committee - establish and maintain a fraud and corruption reporting system, recording data on all fraud and corruption incidents, including detections, investigative and disciplinary actions taken, resultant losses (financial and reputational) and resultant changes (procedures and practices) - provide advice and assistance to the Audit and Risk Management Committee and staff in relation to fraud and corruption risk management - act as the primary senior executive point of contact for allegations of fraud and determine how escalated allegations should be handled - ensure that the FCC Plan is brought to the attention of all staff through training sessions, the intranet or other media - ensure staff induction includes Fraud and Ethics awareness information and raise awareness of mandatory notification requirements to the ACT Integrity Commission.
Audit and Risk Management Committee (ARMC)	monitor the effectiveness of the organisation's integrity arrangements, particularly the conduct of the risk assessments and the implementation of the FCC Plan.
Executive Board	- assist and support the SERBIR in fulfilling obligations arising from the FCC Plan - ensure the wide dissemination of the FCC Plan within HCSD - promote a sound knowledge of the FCC Plan and a culture of fraud control, integrity and reporting allegations of potential fraud and corruption (including all alleged attempts) - foster and develop within HCSD the highest standards of ethical behaviour and actively monitor compliance.
Governance Assurance and Risk Branch	- partner with HCSD divisions to support their risk assessments - assist the SERBIR in ensuring the FCC Plan is up to date and operating effectively within the Directorate - conduct relevant internal audits and spot checks in accordance with the internal audit program - partner with Human Resources Branch to ensure the Director-General and SERBIR are supported in fulfilling their responsibilities in relation to staff and associated issues in dealing with integrity matters.
All Managers of Business Units	ensure that the Directorate risk management framework and FCC Plan are effectively implemented within their responsible areas, ensuring the control procedures are being followed

Responsible Party	Responsibilities
	- regularly assess their responsible areas for the threat of fraud or corruption and ensure the control procedures remain effective - ensure staff attend fraud and corruption awareness training and are aware 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.
Disclosure Officers	receive and deal with reports of conduct from staff or the public which could be considered a public interest disclosure under the <i>Public Interest Disclosure Act 2012</i>.
All staff	- familiarise themselves with the Directorate's risk management framework and FCC Plan - identify, analyse, assess and treat significant business integrity risks in relation to their activities - conduct and document risk management activities in accordance with the Directorate's risk management framework - ensure that they comply with the Directorate's FCC Plan and report any suspicious activities to the SERBIR, their manager, an Executive, a Deputy Director-General or the Director-General - report any maladministration, corruption or fraudulent conduct by a public servant or public sector member of which they have become aware, to the Disclosure Officer, the Head of Service, the Director-General or the ACT Integrity Commission - ensure their personal conduct is always of the highest order, including declaring any personal conflicts of interest, thereby safeguarding the integrity of the ACT Public Service.
Contractors	All contractors when engaged by HCSD are expected to adhere to the same requirements as HCSD staff noting they are acting on behalf of, and represent, HCSD while engaged. These expectations are set out as part of contractual arrangements which are overseen by HCSD contract managers.

Approach

HCSD's approach to fraud and corruption control is based on prevention, detection, and response (reporting and investigation) to fraud and corruption activities.



Prevention

The Director-General visibly endorses fraud control activities and promotes a culture of staff reporting fraud and corruption. Executive Group Managers should ensure that all business processes, particularly those assessed as having a higher predisposition to the risks of fraud and corruption, are subject to a rigorous system of internal controls that are well documented, updated regularly and understood by all staff.

The main objective of a fraud prevention strategy is to adopt methods that would decrease motive, restrict opportunity, and limit the ability of an officer to engage in an unethical act.

Prevention techniques include maintenance of relevant policies, procedures, controls, and activities such as training and fraud awareness communications to prevent fraud and corruption from occurring.

Management should also initiate reviews on a periodic basis to enhance the control effectiveness for relevant risks identified in the HCSD Risk Register.

HCSD Fraud Risk Assessment

A fraud risk assessment measures the vulnerability of an organisation to fraud and is essential for fraud mitigation. HCSD's fraud risks are managed in line with the HCSD's risk management framework, that provides direction for the identification, assessment, mitigation, escalation and reporting of risks. The framework aligns with the ACT Government Risk Management Policy and ACT Insurance Authority (ACTIA) Risk Matrix.

The HCSD fraud risks are captured and managed within the HCSD Risk Register, firstly at the corporate level with the executive responsibility allocated to the SERBIR and Director-General, overseen by the Directorate's Audit and Risk Management Committee and Executive Board.

Secondly, specific fraud and corruption risks are captured at the Divisional level with executive responsibility allocated to the relevant Executive Group Manager. The divisional risk register is reviewed and updated by the risk owners on an ongoing basis.

Risk treatments and management including realistic timetable for implementation of actions can be found in HCSD's risk register.

HCSD's fraud and corruption risk assessment program is undertaken on a HCSD-wide basis to assess the risks and controls in place, in accordance with the HCSD risk management framework. The outcome of HCSD's risk assessment process are registered in the Directorate risk register.

The fraud and corruption risks at the corporate level are categorised under five topic titles with their risk ratings assessed as summarised below.

CORPORATE LEVEL RISKS

Fraud Risk Title	Risk Description
Bribery	A Directorate staff member offers or receives a bribe to influence the individual to act contrary when discharging functions and the known rules of honesty and integrity, which has a financial or non-financial benefit to staff member or associate.
Conflict of Interest and Collusion	A Directorate staff member's decision making is influenced by a conflict or collusion which gives benefit either financial and non- financial and either directly or indirectly to the staff member or associate.
Misappropriation of Funds	Funds are siphoned by a staff member or associate.
Misappropriation of Information	Information is accessed by individual/group who is not approved, to gain benefit either financial or non-financial and either directly or indirectly.
Misappropriation of Assets	Assets, both physical and non-physical, are siphoned by an individual or group to gain benefit financial or non-financial and either directly or indirectly.

Corporate Led Controls

Corporate-led controls include but are not limited to:

- the FCC Plan and associated fraud risk assessments, which are regularly reviewed
- education and awareness campaigns, championed by the SERBIR
- a dedicated 'Integrity' page on the HCSD intranet, to provide 24/7 information to staff
- the HCSD Conflict of Interest Procedure
- the HCSD Gifts Benefits and Hospitality Procedure and Register which are regularly reported to the SERBIR and the ARMC
- the HCSD Financial and Human Resources Delegations
- facilitation of the annual ACT Audit Office financial statements reviews and identified performance audits
- facilitation of regular financial reporting, at various levels, to ensure appropriate management of resources.

Management Led Controls

Managers are required to assess the risks of fraud or corruption occurring in their areas and implement appropriate controls. They should ensure that fraud and corruption prevention measures are updated as workplaces change, and that staff understand their individual responsibilities in preventing fraud and corruption.

Testing of Controls

Controls specified in the fraud risk assessments are reviewed at least annually including progress/adoption of proposed future risk treatments as noted in the assessments, by the Governance Assurance and Risk Branch and reported to the SERBIR and the Audit and Risk Management Committee.

Staff Awareness and Training

HCSD maintains an ongoing fraud and corruption prevention awareness and continuous improvement program, including a range of strategies such as:

- SERBIR communicating regular fraud and corruption prevention awareness and promoting eLearning and training workshops, to ensure staff, contractors and third parties that deliver services on behalf of HCSD are aware of their responsibilities to the Directorate
- Fraud and Ethical Behaviour eLearning modules are mandatory training for all staff
- evaluating the awareness and training initiatives to determine whether they have been successful, and the participants have an improved awareness of fraud control and their responsibilities
- ensuring all updates and changes to fraud and corruption-related policies, procedures, codes of conduct, ethics etc., are accessible to staff
- communicating management and staff responsibilities across the Directorate
- fostering an appropriate fraud and corruption control environment by encouraging all staff to be vigilant and to report any incident of suspected fraudulent activity
- communicating relevant apparent control failures across the Directorate to ensure there is continuous improvement from 'lessons learnt'

- adopting relevant practices recommended by the ACT Auditor-General, Governance, Assurance and Risk (GAR) branch and other organisations (e.g. the Australian National Audit Office)
- in some circumstances, the provision of services to the ACTPS is most appropriately provided by the private sector. HCSD communicates and enforces its expectations relating to fraud and corruption control via contractual agreements with private sector providers.

Detection

Fraud can be detected by establishing effective accounting and system controls and by recognising variations from standard practice.

HCSD employees are considered well placed to detect fraud because of their detailed knowledge of work practices and accountabilities. Staff cooperation, observations and initiative are important in preventing and detecting fraud in the workplace.

Fraud Signals

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

- implausible excuses and reasons for unusual events or actions
- senior staff involved in routine process work such as purchasing, ordering and receiving of 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
- excessive number of duties (e.g. both processing and approving the same transaction) residing with one person
- undue secrecy or excluding people from available information
- unauthorised changes to systems or work practices
- missing documentation relating to client or agency financial transactions
- 'blind approval' where the person signing does not sight supporting documentation.

Internal and External Audit

All areas of HCSD are expected to comply with Directorate policies and procedures and are subject to review by the Internal Audit team.

HCSD is also subject to external audits undertaken by the ACT Audit Office.

Reporting

The Director-General visibly endorses fraud control activities and promotes a culture of staff reporting fraud.

If a staff member becomes aware of possible fraud and corruption, they are obliged to report their concerns. In the first instance, it is generally best to report any concerns to an immediate supervisor/manager or the SERBIR.

If staff are unable to raise the issue with their supervisor/manager or the matter relates to their supervisor/manager, they should raise the issue directly with the SERBIR.

Information on the SERBIR is provided on the HCSD Intranet. In accordance with the ACTPS Integrity Governance Policy, allegations will be handled and will treat all matters with discretion and confidentiality in the first instance.

Staff should report suspicions to only those people who absolutely need to know. This protects people from allegations that may not be proven and prevents the possible destruction of evidence.

Flowchart of reporting of fraud and corruption is provided at *Annexure A*.

Mandatory Reporting Obligations to the ACT Integrity Commission

Under Division 3.1.2 of the *Integrity Commission Act 2018* (the IC Act), the Director-General and members of the senior executive group within the Directorate must notify the ACT Integrity Commission about any matter they suspect, on reasonable grounds, to be serious or systemic corrupt conduct.

Where possible and appropriate, senior executive service officers should advise the SERBIR of any reports made to the ACT Integrity Commission.

Public Interest Disclosures

Staff should be aware that the *ACT Public Interest Disclosure Act 2012* (the PID Act) supports the reporting of wrongdoing, including fraud and corruption. The PID Act encourages and enables anyone witnessing serious wrongdoing that falls within the definition of 'disclosable conduct' to raise concerns. The PID Act sets out the obligations of those raising a potential PID, the protections available for disclosers, how disclosures should be dealt with, and the obligations of staff who manage disclosures and PIDs. Members of the public, as well as current and former ACT public servants, may make a public interest disclosure to any ACT government entity.

HCSD's nominated disclosure officers are published on HCSD Intranet and website.

Investigation

Where there are reasonable grounds for suspecting fraud or corruption may have occurred, the SERBIR will determine whether the matter should be referred to the appropriate body for further assessment. This may include referring the matter to the:

- Public Sector Standards Commissioner, via Human Resources and the Professional Standards Unit
- ACT Integrity Commission
- ACT Policing.

In determining the appropriate response, relevant legislation and policies such as those below are referred to:

- *Public Sector Management Act 1994*
- *Integrity Commission Act 2018*
- *Public Interest Disclosure Act 2012*
- *Information Privacy Act 2014*
- *Fair Work Act 2009*
- ACTPS Enterprise Agreements
- ACTPS Code of Conduct
- ACTPS Decision Maker's Handbook.

Following the discovery of fraud or corruption, the SERBIR will determine if an internal control review is required. An internal control review will include a reassessment of the adequacy of the internal control environment (particularly those controls directly impacting on the incident and potentially allowing it to occur) and will consider whether improvements are required. Where improvements are required, these should be implemented as soon as practicable.

Records Management

All reports of fraud or corruption are recorded by the SERBIR and the GAR branch. Records are updated to include information including all instances of fraud and corruption, investigative action taken and outcomes (e.g. referral to the ACT Integrity Commission, disciplinary action, changes to procedures). All records will be handled under a strict 'need to know basis' and will be maintained in line with the *Territory Records Act 2002*, Directorate and ACTPS information security requirements.

Evaluation

As per the ACTPS Integrity Governance Policy and the Director-General Instruction (DGI), all directorates must undertake a fraud risk assessment and prepare a FCC Plan and the Plan must be reviewed every two years.

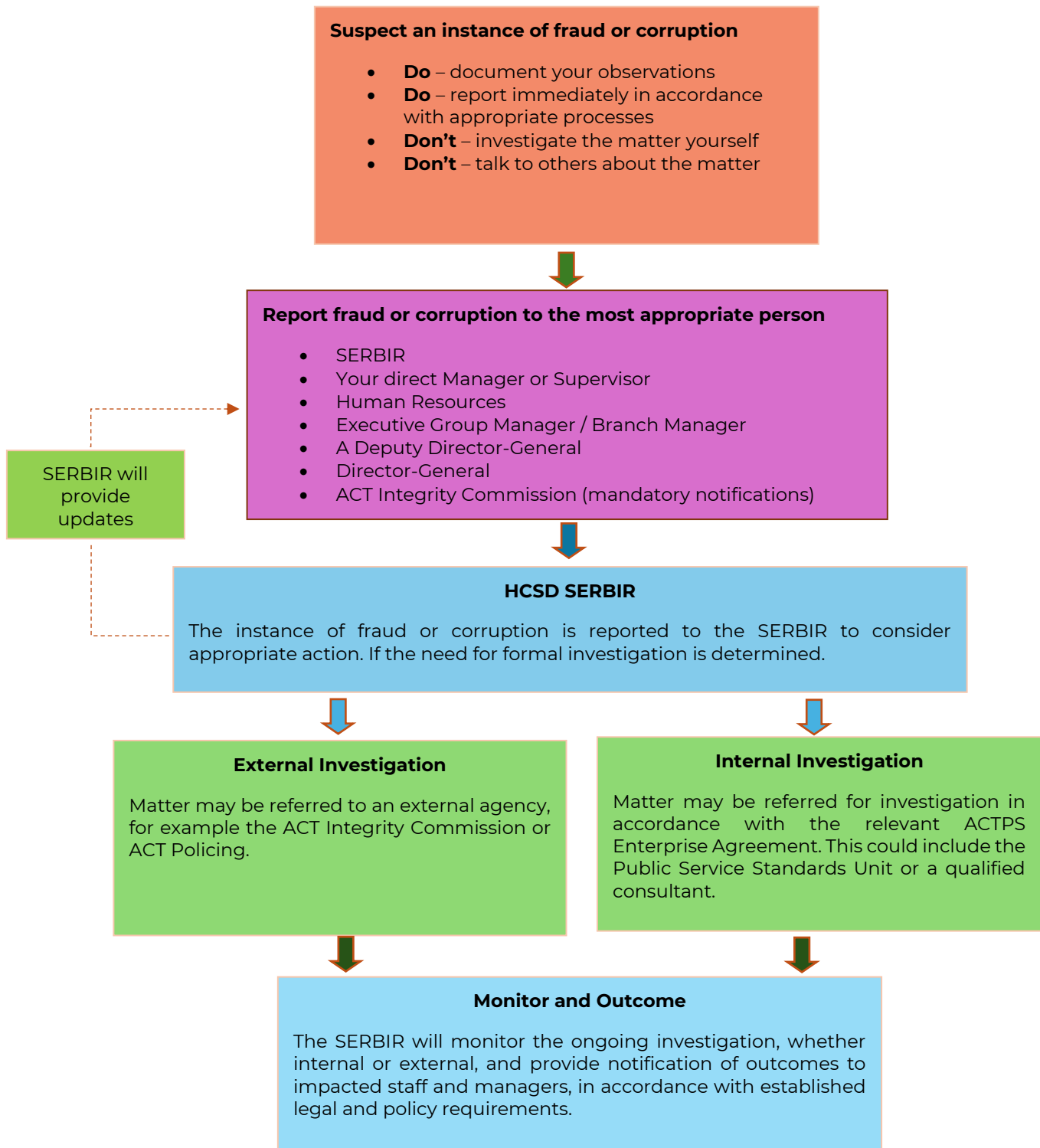
Review Date

The next review of this document is due within two years from the issue date.

Version Control

Version	Date	Comments
1.0	June 2026	HCSD Fraud and Corruption Control Plan approved by the Director-General

Annexure A - Flowchart of reporting and investigation of fraud and corruption



Annexure B - Definition of Corruption under the *Integrity Commission Act 2018*

Integrity Commission Act 2018 defines corrupt conduct as below:

corrupt conduct is conduct—

- (a) that could—
 - (i) constitute a criminal offence; or
 - (ii) constitute a serious disciplinary offence; or
 - (iii) constitute reasonable grounds for dismissing, dispensing with the services of, or otherwise terminating the services of, a public official; and
- (b) that is any of the following:
 - 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 while performing their official functions, whether 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.