



Fraud and Corrupt Conduct Control Plan

Plan

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1 Purpose

The National Heavy Vehicle Regulator (NHVR) has zero tolerance for fraud and corrupt conduct. The NHVR is committed to the highest possible standards of integrity and ethical conduct, transparency and accountability.

Preventing, detecting and responding to fraud and corrupt conduct is integral to that commitment.

This plan outlines the NHVR’s framework for addressing risks of fraud and corrupt conduct (with linkages to other documents that are included in the framework) with the goal of:

- minimising opportunities for fraud and corrupt conduct
- protecting the lawful discharge of functions and powers by the NHVR and NHVR staff (including Board members, contractors, volunteers etc.)
- protecting public confidence in the discharge of those functions and powers
- ensuring that the monies, property, information and other rights, interests, and legitimate expectations of the NHVR (including its reputation) are protected.

2 Application

The application of this Plan is via:

- defining and providing examples of fraud and corrupt conduct
- outlining relevant obligations under the Anti-Corruption Acts¹ that apply to the NHVR
- outlining the principles of Prevention, Detection, and Response and how they are applied
- outlining the roles and responsibilities of NHVR staff in the management and control of risks of fraud and corrupt conduct.

The NHVR’s approach to fraud and corrupt conduct is supported by risk management mechanisms which include policies, guidelines, risk assessments, internal controls, investigations, reporting, education and awareness, and independent auditing.

This Plan integrates with, and should be read alongside the following documents to understand the NHVR’s whole framework for dealing with fraud and corruption (the NHVR’s Fraud and Corruption Control Framework):

- [Fraud and Corrupt Conduct – Policy](#)
- [Public Interest Disclosures – Policy](#)
- [Code of Conduct – Policy](#)
- [Managing Board member conflicts of interest – Policy](#)
- [Conflict of Interest – Policy](#)
- [Dealing with a complaint involving the NHVR’s Chief Executive Officer – Policy](#)
- [Whistle-Blower Hotline – Quick Guide](#).

3 Scope

This Plan applies to all employees and individuals performing services for and on behalf of the NHVR, regardless of their employment status (NHVR staff). This includes NHVR Board members, NHVR employees, contractors, work experience placements, and volunteers.

4 Fraud and corrupt conduct

4.1 Fraud

This Plan adopts the definition of ‘Fraud’ in the *Australian Standard AS 8001-2008: Fraud and Corruption Control*, being:

¹ This term is defined in section 4 below.

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.

Some examples of fraud include:

- theft of plant or equipment
- falsifying timesheets or other records
- misuse of corporate credit cards, false invoicing and theft of funds other than by false invoicing
- collusion in tendering or the awarding of contracts
- misuse of confidential information to obtain a financial benefit.

4.2 Corrupt conduct

The relevant Acts that deal with corrupt conduct are (collectively, the Anti-Corruption Acts):

- Queensland, the *Crime and Corruption Act 2001 (Qld)* (CCC Act (Qld))
- New South Wales, the *Independent Commission Against Corruption Act 1988 (NSW)* (ICAC Act (NSW))
- Australian Capital Territory, the *Integrity Commission Act 2018 (ACT)* (IC Act (ACT))
- Victoria, the *Independent Broad-based Anti-corruption Commission Act 2011 (Vic)* (IBAC Act (Vic))
- South Australia, the *Independent Commissioner Against Corruption Act 2012 (SA)* (ICAC Act (SA))
- Tasmania, the *Integrity Commission Act 2009 (Tas)* (IC Act (Tas)).

Each of those Acts defines 'corruption' or 'corrupt conduct'.

The following summary of those definitions is adopted for the purposes of this Plan (which also incorporates the definition of 'corruption' in *Australian Standard AS 8001-2008: Fraud and Corruption Control*):

Dishonest activity in which NHVR staff act against the interests of the NHVR and abuse their position of trust in order to achieve some personal gain or advantage for themselves, another person or organisation.

It is also such dishonest activity that affects, or could affect, how NHVR staff perform their functions or exercise their powers or involves conduct that impairs, or could impair, public confidence in public administration.

For this Plan, 'Corruption' and 'Corrupt Conduct' are the same and are used interchangeably.

Corrupt conduct can involve conduct in order to secure improper advantage or benefit for the NHVR. That advantage or benefit could be direct or indirect.

Some examples of corrupt conduct include:

- payment or receipt of bribes (whether monetary or otherwise)
- release of confidential information for benefit or advantage (whether financial or otherwise) to the person releasing the information (or receiving the information)
- manipulation of a procurement process to favour one tenderer over another
- improperly exercising an on-road function or power to benefit oneself or a third party.

5 The Anti-Corruption Acts

Each of the Anti-Corruption Acts establish a commission that regulates and monitors complaints of corrupt conduct. For the purposes of this Plan, 'the Commission' is a generic reference to such commissions.

All of the Anti-Corruption Acts apply to the NHVR, with the exception of the IC Act (Tas).²

² The IC Act (Tas) seeks to regulate and monitor complaints of corrupt conduct in relation to 'public authorities'. The NHVR does not fall within the definition of that term under the IC Act (Tas). Corrupt conduct with jurisdictional connection to Tasmania is dealt with later in this Plan.

The obligations upon the NHVR across those Acts are similar, but still differ. Table 1 provides a simplified summary of those obligations.

Table 1 – Relevant Sections of each HVNL Jurisdiction’s Anti-Corruption Acts³

Obligation	Qld	NSW	ACT	Vic	SA
Duty of CEO to notify commission of corrupt conduct	38	11	62 & 65	57	20(3)(b)
Commission may issue directions about notifications that must be complied with (CEO only, except NSW)	40	56	64	57A	20(3)(a)
Responsibility of CEO to deal with complaint referred to it by the commission	43	53			
CEO must keep record of alleged corrupt conduct not notified	40A				
CEO must prepare a policy about how complaints involving public official are to be dealt with	48A				

The two most common obligations upon the NHVR are:

- the duty of the NHVR’s CEO to notify the Commission if the CEO reasonably suspects that a complaint, or information or matter (collectively, a complaint), involves, or may involve, corrupt conduct⁴
- ensuring compliance (by the CEO only, except in NSW where it’s the CEO and the NHVR) with any directions issued to the NHVR by the Commission.⁵

The Anti-Corruption Acts also contain obligations that are specific to certain jurisdictions.

All of these obligations have been incorporated into the NHVR’s [Fraud and Corrupt Conduct – Policy](#). They are outlined below to inform the NHVR’s Fraud and Corruption Control Framework.

5.1 Duty to notify

5.1.1 CEO’s duty to notify

Generally under the Anti-Corruption Acts, there is a duty on the NHVR’s CEO to notify the Commission if, on reasonable grounds, the CEO suspects that a complaint involves, or may involve, corrupt conduct.

In the CCC Act (Qld), this duty is declared to be paramount. Consequently, the CEO *must* comply with this duty, despite the provisions of any other Act or any obligation to maintain confidentiality about a matter to which the complaint relates.⁶

‘Reasonable suspicion’ requires more than bare or idle speculation. It’s determined by objectively assessing the information at hand.

However, it isn’t necessary to have sufficient evidence to prove the allegation of corrupt conduct. The CEO must be satisfied that the facts, evidence or other information available to the CEO would suggest that the allegation, if proven, would constitute corrupt conduct.

If the CEO determines that a reasonable suspicion of corrupt conduct doesn’t exist, and decides that a complaint does not need to be notified to the Commission, the CEO must make a record of the decision to not notify.

As a minimum, that record must include:

- how the CEO assessed the complaint against the definition of corrupt conduct
- why, in the CEO’s view, the complaint did not meet the threshold for notification to the Commission
- endorsement by the PID Coordinator of the CEO’s assessment⁷

³ Save as for Tasmania

⁴ CCC Act (Qld) s 38; ICAC Act (NSW) s 11; IC Act (ACT) ss 62 and 65; IBAC Act (Vic) s 57; ICAC Act (SA) s 20(3)(b).

⁵ CCC Act (Qld) s 40; ICAC Act (NSW) s 56; IC Act (ACT) s 64; IBAC Act (Vic) s 57A(5); ICAC Act (SA) s 20(3)(a).

⁶ CCC Act (Qld) s 39.

⁷ Or, if the complaint concerns the PID Coordinator, the Chief Corporate Officer.

- details of the steps taken to deal with any perceived or actual conflict if there were any conflict of interest issues.

In the IC Act (ACT), the CEO has a mandatory duty to notify the Commission if the conduct is serious corrupt conduct or systemic corrupt conduct.⁸ It's an offence if the CEO knows that a public official has engaged in serious corrupt conduct or systemic corrupt conduct and does not, as soon as practicable, notify the Commission about the conduct.⁹

In the ICAC Act (SA), the NHVR or the CEO may report any matter that it reasonably suspects involves corruption, misconduct or maladministration in public administration.¹⁰ The CEO should consider reporting to the Commission, unless they know that the conduct has already been reported to the Commission.

In the ICAC Act (NSW), the CEO must report to ICAC any matter that the CEO suspects on reasonable grounds concerns or may concern corrupt conduct.¹¹

In the IBAC Act (Vic), the CEO must notify IBAC of any matter that the CEO suspects on reasonable grounds involves corrupt conduct occurring or having occurred.¹²

In the IC Act (Tas), the CEO may still report reasonable suspicion of corrupt conduct to the Tasmanian Integrity Commission.

There may be circumstances where suspected corruption has a connection to more than one jurisdiction, potentially triggering notification to more than one Commission. In such circumstances, notification should be made to each Commission for which there is a relevant jurisdictional connection.

5.1.2 Duty of SA 'Public Officers' to notify

Under the ICAC Act (SA), there is a duty on 'public officers' to report reasonably suspected corrupt conduct to the Commission, unless the public officer is aware that the conduct has already been reported.

'Public officer' includes any NHVR staff.

For consistency of application and to facilitate support to NHVR staff, the NHVR's Fraud and Corruption Control Framework is premised upon all notifications of corrupt conduct being made to the PID Coordinator (or to the 'nominated persons' under the NHVR's [Dealing with a complaint involving the NHVR's Chief Executive Officer – Policy](#) if the complaint is against the CEO). Notification to the Commission(s) then moves from the CEO.

Please refer to the NHVR's [Whistle-Blower Hotline – Quick Guide](#) and [Public Interest Disclosure – Policy](#) (and Guidelines) for further information about how to report a complaint to the PID Coordinator. Those documents will also explain whether the complaint may constitute a public interest disclosure and what happens after a complaint is made to the PID Coordinator.

5.2 Compliance with directions

The Anti-Corruption Acts empower their respective Commissions to issue directions on a number of issues. While the content of the directions may vary across each jurisdiction, the NHVR is obligated to comply with each direction.

In the CCC Act (Qld), the Commission may issue directions about the kinds of complaints that the CEO must or need not notify, as well as how and when the CEO must notify the Commission of these complaints of corrupt conduct.¹³ The NHVR must be consulted by the Commission before the direction is issued.¹⁴ However upon issue, the CEO must comply with the direction.¹⁵

In the ICAC Act (NSW), the obligation of the NHVR and the CEO to comply with any directions issued by the Commission arises in the context of complaints that are referred to the NHVR or the CEO by the Commission.¹⁶

Under the ICAC Act (ACT), the CEO must comply with any directions the Commission may make in relation to the mandatory duty to notify of systemic corrupt conduct or serious corrupt conduct.¹⁷

⁸ IC Act (ACT) s 62.

⁹ IC Act (ACT) s 65.

¹⁰ ICAC Act (SA) s 20(3)(b).

¹¹ Section 11(2) ICAC Act (NSW).

¹² Section 57 IBAC Act (also, see s 57B).

¹³ CCC Act (Qld) s 40.

¹⁴ CCC Act (Qld) s 40(2)(a).

¹⁵ CCC Act s 40(4).

¹⁶ ICAC Act (NSW) s 56.

In the IBAC Act (Vic), the Commission may issue directions in relation to the CEO's duty to notify. The directions may be general or as specific as the Commission requires.¹⁸

5.3 Other obligations

The CCC Act (Qld) establishes that it is the CEO's responsibility to deal with a complaint about or involving corrupt conduct that is referred to the NHVR by the Commission.¹⁹ If a complaint is made directly to the NHVR, it must be dealt in the way the CEO considers most appropriate.²⁰ The CEO may consider making preliminary enquiries to first ascertain the nature and extent of any alleged conduct that may have resulted in the complaint.

The CEO may take no action or discontinue action taken to deal with the complaint if the CEO is satisfied that:²¹

- a complaint is frivolous or vexatious, or lacks substance or credibility

or

- dealing with the complaint would be an unjustifiable use of resources.

The CEO should exercise caution in considering whether to dismiss a complaint, especially in circumstances where the Commission has referred the complaint directly to the CEO.²²

Regardless, the CEO must provide a response to the person making the complaint as to whether action has, or has not been taken on the complaint and the CEO's reasons. A response by the CEO is not required if:²³

- the person has not provided their name or address
- the person does not require a response

or

- the response would disclose information where the disclosure of which would be contrary to the public interest.

Where appropriate, the CEO may ask the Commission to deal with a complaint made directly to the NHVR in cooperation with the CEO.²⁴

The ICAC Act (NSW) also provides that the Commission may refer the complaint to the CEO or the NHVR.²⁵

6 Public Interest Disclosure Acts

The NHVR's *Public Interest Disclosure – Policy* outlines the NHVR's commitment to using applicable Public Interest Disclosure (or 'whistle-blower') frameworks to manage relevant disclosures and create an environment of integrity, openness, and safety.

The following 'PID Acts' apply to the NHVR:

- Queensland, the *Public Interest Disclosure Act 2010 (Qld)*
- NSW, the *Public Interest Disclosures Act 1994 (NSW)*
- Victoria, the *Protected Disclosure Act 2012 (Vic)*
- South Australia, the *Public Interest Disclosure Act 2018 (SA)*.

The NHVR has separate PID Guidelines for each of those jurisdictions. These have been published on the NHVR's website. The Guidelines provide a step-by-step guide about what constitutes a public interest disclosure, how to make a public interest disclosure, and what happens next.

The *Public Interest Disclosure Act 2012 (ACT)* is dis-applied to the NHVR by the *Heavy Vehicle National Law (ACT) Act 2013*.²⁶ The *Public Interest Disclosure Act 2002 (Tas)* does not apply to the NHVR.²⁷

¹⁷ IC Act (ACT) s 64.

¹⁸ IBAC Act (Vic) s 57A.

¹⁹ CCC Act (Qld) s 43.

²⁰ CCC Act (Qld) s 44(2).

²¹ CCC Act (Qld) s 44(3).

²² Crime and Corruption Commission guide titled 'Corruption in Focus: A guide to dealing with corrupt conduct in the Queensland public sector' published 22 January 2020, p 3.2.

²³ CCC Act (Qld) s.44(6).

²⁴ CCC Act (Qld) s.44(4).

²⁵ ICAC Act (NSW) s 53(1).

²⁶ *Heavy Vehicle National Law (ACT) Act 2013* s 9.

The PID Coordinator will decide the relevant jurisdiction under which the disclosure will be actioned. If the disclosure involves an employee located in, or conduct occurring in, Tasmania or the ACT, the PID Coordinator will determine whether the Queensland or another jurisdiction’s framework can be utilised.

7 Planning and resourcing

7.1 PID Coordinator

The NHVR’s PID Coordinator is responsible for:

- implementing and monitoring the NHVR’s Fraud and Corruption Control Framework
- providing annual fraud and corrupt conduct prevention training to all NHVR staff
- implementing any recommendations received and accepted from reviews or fraud risk assessments
- facilitating and overseeing investigations of complaints of suspected fraud and corrupt conduct for the NHVR.

7.2 Whistle-Blower Hotline

The NHVR has a dedicated internal Whistle-Blower Hotline, being (07) 3309 8889.

NHVR staff may confidentiality report fraud or corrupt conduct to the NHVR via the hotline. Callers may remain anonymous. The Whistle-Blower Hotline is monitored by the PID Coordinator.

The NHVR’s [Whistle-Blower Hotline – Quick Guide](#) advises how to use the hotline (as well as alternate means for making contact with, or complaints to, the PID Coordinator).

7.3 Fraud and Corruption Risk Register

The NHVR has a dedicated *Fraud and Corruption Risk Register* (Located in OneTree).

The Register is a living document which is reviewed at least annually and includes treatment mitigation plans and identified controls. All identified fraud and corruption risks are assigned risk owners and controls are assigned to control owners.

The Register is maintained by the NHVR’s Risk and Assurance Specialist.

7.4 Fraud and Corruption Awareness Training

The NHVR has developed and provides annual fraud and corrupt conduct prevention training. The training is mandatory for all NHVR staff.

7.5 Internal audits

The NHVR has an annual internal audit program which provides assurance across operational risks and processes, including identifying indicators of fraud and corruption.

8 Prevention

‘Prevention’ means initiatives to prevent and minimise the risk of fraud and corrupt conduct.

8.1 Integrity framework

The NHVR is committed to maintaining a good ethical culture and, specifically, via its integrity framework, which includes:

- ‘people matter’ as a core value of the NHVR, with such core values informing the NHVR’s Corporate Plan
- the [Code of Conduct – Policy](#), which makes clear the NHVR’s commitment to ethical behavior

²⁷ The NHVR and NHVR staff are not, respectively, ‘public bodies’ or ‘public officers’ under that Act.

- commitment by the NHVR Board and ELT to an ethical culture and the active promotion of such culture
- annual Code of Conduct training for NHVR staff and Code of Conduct training for all new NHVR staff
- support provided to NHVR staff who complain of workplace bullying, harassment, or discrimination, with such complaints managed according to NHVR policies and procedures
- an annual culture survey of NHVR staff to benchmark internal satisfaction and engagement with the NHVR's culture and to inform improvements
- an organisational-wide culture action plan.

8.2 The NHVR Board and ELT

The NHVR Board and ELT are committed to:

- maintaining and ensuring regular review of internal control processes to minimise the risk of fraud and corrupt conduct
- promoting and demonstrating compliance with the NHVR's Fraud and Corrupt Conduct Framework.

They will:

- ensure that there are suitably documented decision-making policies and procedures and other internal controls²⁸
- ensure that there are appropriate delegations and authorisations (e.g. expenditure, contracting, hiring, procurement, the discharge of statutory functions and powers etc.)
- lead by example in complying with the NHVR's Fraud and Corruption Control Framework
- keep informed of the types of fraud and corrupt conduct common to statutory bodies
- ensure that internal controls are reviewed and updated periodically, as may be required.

8.3 Internal controls

Internal controls are existing processes, policies, devices, practices and other actions that act to minimise negative risks or enhance positive opportunities.²⁹ They are the first line of defence against fraud and corrupt conduct.

Effective internal controls are developed and maintained through the work and collaboration of different business units. Managers, Directors, and Executives are responsible for daily operations and for maintaining or complying with the NHVR's internal controls.

Examples of such controls include the:

- *Policy – Financial Management*
- *Procurement – Policy and Procurement – Management Standard*
- *Work Arrangements – Work Procedure*
- policies and work procedures outlining how NHVR staff are to discharge their duties and responsibilities under the HVNL.

Internal controls are frequently the subject of internal audit. The artefacts encapsulating internal controls (e.g. policies, work procedures etc.) are also reviewed annually.

8.4 Assessing fraud and corruption risks

The NHVR's *Enterprise Risk and Assurance – Policy* outlines the NHVR's approach to risk management, which includes:

- identifying the individuals responsible for risk mitigation and control
- identifying and explaining the NHVR's risk appetite and tolerance levels
- advising that the NHVR manages risks in accordance with the process prescribed by *AS/NZS ISO 31000:2009, Risk Management – Principles and Guidelines*.

²⁸ 'Internal controls' is defined in the next section.

²⁹ *Australian Standard AS 8001-2008: Fraud and Corruption Control*, s 1.7.3. (The NHVR's *Risk and Assurance Policy* defines 'control' in similar terms, i.e.: 'Measure that maintains and/or modifies risk. Controls are physical things in place which will minimise the level of risk. The control owner should keep a watching brief to ensure the control continues to be effective/slightly differently.'

The *Enterprise Risk and Assurance - Policy* adopts the ‘three lines of defence’ assurance model and indicates roles and responsibilities for managing all risks.

8.5 Conflicts of interest

The NHVR has a robust approach to conflicts of interest, which is reflected in the NHVR’s:

- [Policy – Conflict of Interest](#)
- [Policy – Managing Board member conflicts of interest](#).

The NHVR also has a clear approach to reporting receipt of gifts and benefits, which is outlined in the NHVR’s [Managing Gifts and Benefits – Work Procedure](#). A register of such gifts and benefits is maintained.

9 Detection

‘Detection’ means initiatives to detect fraud or corruption as soon as reasonably possible after it has occurred.

9.1 Reporting fraud or corrupt conduct

The NHVR has detailed and robust requirements around reporting fraud and corrupt conduct. Ultimately, NHVR staff who reasonably suspect fraud or corrupt conduct should report such conduct.

Complaints of fraud or corrupt conduct may be reported to the PID Coordinator by:

- the NHVR’s *Whistle-Blower Hotline*
- email: PID@nhvr.gov.au

or

- in person.

All reports are treated in strict confidence. Reports can be made anonymously. The PID Coordinator will consider whether a reported complaint amounts to a public interest disclosure.

9.2 Detection programs

The NHVR monitors purchases (e.g. via corporate credit cards), the use of financial authorisations (e.g. via purchase orders), procurement authorisations and compliance with probity requirements.

The NHVR also utilises software applications and other techniques to identify suspect activities or transactions, e.g.:

- monitoring use of third party personal information to ensure it isn’t used for an unauthorised purpose
- the raising and payment of invoices
- monitoring use of RCMS for authorised purposes (e.g., monitoring for out of hours use, searches for third parties unrelated to on-road activities etc.).

The NHVR is currently exploring data-mining and analytics to better detect and examine risks of fraud and corrupt conduct.

9.3 Internal audits

Internal audits provide advice and guidance on the design and effectiveness of internal controls. Please see section 7.5 above.

10 Response

‘Response’ means initiatives to deal with identified or reasonably suspected fraud or corrupt conduct.

10.1 Investigations and disciplinary procedures

Reports of fraud or corrupt conduct will be investigated, subject to (or pursuant to) any applicable directions or requirements from an Anti-Corruption Commission.

The NHVR may retain a third party to undertake any investigation (e.g. private investigators).

The NHVR’s PID Guidelines outline the approach to investigations to complaints that constitutes a public interest disclosure.

Appropriate action will be taken which may include disciplinary action or referral to the relevant police service or Anti-Corruption Agency.

All reasonable assistance will be provided by the NHVR to police or an Anti-Corruption Agency.

10.2 Review and escalation

Division specific risks are incorporated into Divisional risk registers. Organisation-wide risks remain on the fraud and corruption risk register, with nominated controls and risk assessments.

Risks of fraud and corrupt conduct are, like other risks, incorporated into the annual development of strategic and operational planning and resourcing.

10.3 Civil proceedings

The NHVR will decide on a case-by-case basis whether any recovery actions are to be pursued in relation to loss arising from fraud or corrupt conduct.

10.4 Review of internal controls

In each instance where fraud or corrupt conduct is detected, the PID Coordinator will, in conjunction with the business area custodian of relevant policies and procedures (etc.), review and re-assess the effectiveness of relevant internal controls in response to fraud or corrupt conduct. Such review may occur with the assistance of third parties (e.g. external risk consulting specialists).

Should such review result in identification of changes being required, such changes will be evaluated and, if determined necessary and effective, implemented.

11 Responsibilities

Position	Responsibilities
Chief Executive Officer	<ul style="list-style-type: none"> Communicates to all employees that it is essential to carry out their duties to a high professional and ethical standard and to always act in the public interest. Assures all employees that there is a system in place to receive and address disclosures of wrongdoing, that also provides protection to the discloser and ensures confidentiality. Ensures there is a reporting system in place for complaints of fraud and corrupt conduct and that it provides protection to the discloser, as required by law. Complies with all obligations placed upon the CEO under the Anti-Corruption Acts. Ensures that all staff have undergone training for the NHVR’s Fraud and Corrupt Conduct Control Framework. Ensures that the principles of Prevention, Detection, and Response are adhered to and updated as required.
Chiefs/Executive Directors/ Directors/ Managers/ Supervisors	<ul style="list-style-type: none"> Supports and reinforces the NHVR’s commitment to the Fraud and Corrupt Conduct Control Framework. Promotes compliance with the Fraud and Corrupt Conduct Control Framework, leads by example, and ensures compliance with internal controls (and contributes to annual review of internal control documents as required). Cooperates with the PID Coordinator to facilitate an investigation if required.

Position	Responsibilities
PID Coordinator (Director, Legal Services)	<ul style="list-style-type: none"> The responsibilities listed in section 7.1 above. Monitors the Whistle-Blower Hotline. Ensures compliance with the statutory requirements of the Public Interest Disclosure Acts that apply to the NHVR. Reports the PID to the relevant oversight agency (e.g. Queensland Ombudsman’s Office if the PID is handled under the <i>Public Interest Disclosure Act 2010 (Qld)</i>).
Risk and Assurance Specialist	<ul style="list-style-type: none"> Annual review of the Fraud and Corruption Risk Register. Assignment of risk owners and control owner. Monthly review of the Fraud and Corruption Risk Register treatment mitigation plans and assessment of controlled risk ratings.
All NHVR Staff	<ul style="list-style-type: none"> Comply with the NHVR’s Fraud and Corrupt Conduct Control Framework.

12 Definitions

The following terms are specific to this Plan.

Term	Definition
Anti-Corruption Acts	As defined in section 4 above.
Complaint	As defined in section 5 above.
Contractor	Any persons employed and paid by another entity/organisation to perform services for and on behalf of the NHVR.
Corrupt Conduct/ Corruption	As defined in section 4 above.
Fraud	As defined in section 4 above.
NHVR staff	As defined in section 3 above.
PID Coordinator	<p>The NHVR officer authorised by the NHVR’s Chief Executive Officer for the implementation of the NHVR’s PID management program and as the principal point of contact with the relevant oversight agency.</p> <p>The PID Coordinator is the Director Legal Services.</p>
Public Interest Disclosure (PID)	<p>A disclosure to the NHVR of information consistent with the:</p> <ul style="list-style-type: none"> <i>Public Interest Disclosure Act 2010 (Qld)</i> <i>Public Interest Disclosures Act 1994 (NSW)</i> <i>Public Interest Disclosure Act 2018 (SA)</i> <i>Protected Disclosure Act 2012 (Vic)</i>.

13 References

Related legislation

- Crime and Corruption Act 2001 (Qld)*
- Independent Commission Against Corruption Act 1988 (NSW)*
- Integrity Commission Act 2018 (ACT)*

- *Independent Broad-based Anti-corruption Commission Act 2011 (Vic)*
- *Independent Commissioner Against Corruption Act 2012 (SA)*
- *Public Interest Disclosure Act 2010 (Qld)*
- *Public Interest Disclosures Act 1994 (NSW)*
- *Protected Disclosure Act 2012 (Vic)*
- *Public Interest Disclosure Act 2018 (SA)*

Related policies

- *Code of Conduct - Policy*
- *Fraud and Corrupt Conduct – Policy*
- *Public Interest Disclosures – Policy*
- *Guideline – Public Interest Disclosure (Qld)*
- *Guideline – Public Interest Disclosure (NSW)*
- *Guideline - Public Interest Disclosure (SA)*
- *Guideline – Protected Disclosure Act (Vic)*
- *Conflicts of Interest – Policy*
- *Managing Board member conflicts of interest – Policy*
- *Dealing with a complaint involving the NHVR’s Chief Executive Officer – Policy*
- *Whistle-Blower Hotline – Quick Guide*