

Fraud and Corruption Prevention Policy

Commitment:

WaterNSW is committed to fostering a workplace culture that delivers the highest standards of safety, respect, performance and integrity for employees and the customers and communities we serve. We are committed to conducting our business in accordance with strict standards of honesty and our values, in particular "Own it."

This Policy sets agreed organisational standards and provides guidance on how to control Fraud and Corruption¹. The policy applies to all directors, employees, agency staff, suppliers and contractors performing work or providing services to WaterNSW. WaterNSW has zero tolerance for any act involving fraud and corruption.

This Policy is supported by the Fraud and Corruption Prevention Framework which outlines the conceptual framework for preventing fraud and corruption, and the policies and procedures for the identification and management of related risks. The Fraud and Corruption Procedure outlines the key roles, responsibilities, and activities to be undertaken to prevent, detect, investigate, and respond to fraud and corrupt conduct which are consistent with the values, objectives, and the strategic direction of WaterNSW.

Actions:

In support of our commitment to build a positive culture free of fraud and corruption, WaterNSW will:

- Maintain an organisation-wide fraud and corruption control framework through documented frameworks, policies and procedures that are consistent with the NSW *Fraud and Corruption Control Policy* (Treasury Circular 18-02) and WaterNSW Risk Management Framework, including Risk Appetite Statements;
- Establish and maintain clear identification of roles and responsibilities in preventing and mitigating fraud and corruption risks;
- Execute strategies for the prevention, detection, and response to actual or perceived instances of fraud and corruption;
- Monitor developments to support continued improvement opportunities with respect to new and developing risks; and
- Regularly monitor, review and report on any actual or perceived fraud and corruption instances.

Roles and Responsibilities:

- All WaterNSW Directors, employees, agency staff, suppliers and contractors are responsible for considering and managing fraud and corruption risks in their role and reporting suspected or detected fraud and corrupt conduct.
- Board – approval of the WaterNSW Fraud and Corruption Prevention Policy at least every 3 years, or as required.
- Board Audit and Risk Committee (ARC) - review and endorsement of the Policy each financial year and oversight of effectiveness reviews of the Fraud and Corruption Prevention Framework.
- Chief Executive Officer (CEO) and Executive Managers - establish and maintain policies, systems and procedures for all aspects of WaterNSW operations to support the objectives of this Policy and the Fraud and Corruption Prevention Framework.
- Finance, Legal and Risk Portfolio - facilitate reviews of the Fraud and Corruption Prevention Framework and reporting on the effectiveness of the framework.
- Disclosures Panel Members and Disclosures Coordinator – investigation of disclosures, and notification to CEO or Chair of ARC as appropriate.

Relationship with other Policies:

- WaterNSW Code of Conduct (and supporting guidance documents);
- WaterNSW Reporting and Responding to Alleged Wrongdoing and Criminal Conduct Procedure;
- WaterNSW Investigating Alleged Wrongdoing and Criminal Conduct Procedure;
- WaterNSW Third Party Reporting Protocol;
- WaterNSW Financial Delegations;
- WaterNSW Purchasing Policy and Procedures (including Supplier Code of Conduct);
- WaterNSW Corrective and Disciplinary Action Procedure; and
- WaterNSW Managing Workplace Complaints Procedure.

Reporting wrongdoing:

Information on the internal reporting system for staff to report wrongdoing without fear of reprisal or disadvantage including details of nominated disclosures officers or the disclosures co-ordinator can be found on the WaterNSW [Intranet](#) as well as the [Reporting and Responding to Alleged Wrongdoing and Criminal Conduct Procedure](#). WaterNSW will act with an appropriate response where an instance of fraud or corruption is substantiated. Suspicions of wrongdoing can also be reported 24/7 to WaterNSW's independent disclosure service, Your Call. Options include: <https://www.yourcall.com.au/report> - using unique identifier code, WATERNSW; available 24/7; or by calling 1800 751 298; available 9am to 12am, Monday to Friday, excluding national public holidays.

Approved by

The Board of WaterNSW 31 August 2022

Chief Executive Officer (following endorsement by the Board Committee on Audit and Risk 16 August 2023)

¹ Fraud refers to dishonestly obtaining a benefit, or causing a loss, by deception or other means. In broad terms, corruption is deliberate, serious wrongdoing that involves dishonest or partial conduct, a breach of public trust or the misuse of information or material. A more detailed definition is found in s 7, s 8 and s 9 of the *Independent Commission Against Corruption Act 1988* (Source: ICAC Model Fraud and Corruption Control Policy 2021)