AUDIT, RISK AND IMPROVEMENT COMMITTEE MEETING

AGENDA

20 July 2026

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CITY OF GREATER GERALDTON

AUDIT, RISK AND IMPROVEMENT COMMITTEE MEETING TO BE HELD ON TUESDAY 20 JULY 2026 AT 3.30PM CHAMBERS – CATHEDRAL AVENUE

A G E N D A

1 DECLARATION OF OPENING

2 ATTENDANCE

Present:
Michael Librizzi, Presiding Member
Mayor Jerry Clune
Deputy Mayor Colliver
Cr Milnes
Cr Van Styn

Officers:
Ross McKim, Chief Executive Officer
Paul Radalj, Director Corporate Services
Chris Lee, Director Infrastructure Services
Tony Free, Director Development Services
Nita Jane, Chief Financial Officer
Larisa Maldea, Manager Corporate Compliance
Ben Clow, Coordinator Airport Operations
Michael Jones, Coordinator Governance & Risk, Minute Secretary
Ashley Maple, Senior Cybersecurity Engineer

By Invitation:

Apologies:
Shane Bishop, Manager ICT Services

Leave of Absence:

3 CONFIRMATION OF PREVIOUS MINUTES

Recommendation: That the minutes of the City of Greater Geraldton Audit, Risk and Improvement Committee (ARIC) meeting held on **24 February 2026** as attached be accepted as a true and correct record of proceedings.

4 ITEMS FOR AUDIT, RISK AND IMPROVEMENT COMMITTEE REVIEW

AC186	APPLICATION OF COUNCIL POLICY 4.28 MANAGING UNREASONABLE CUSTOMER CONDUCT
AGENDA REFERENCE:	**D-26-081061**
AUTHOR:	**S McCaughey, Manager Customer & Business Engagement**
EXECUTIVE:	**T Free, Director Development Services**
DATE OF REPORT:	**2 July 2026**
FILE REFERENCE:	**GO/11/0020**
ATTACHMENTS:	**No**

EXECUTIVE SUMMARY:
The purpose of this report is to present to the Audit, Risk and Improvement Committee the application of Council Policy 4.28 – Managing Unreasonable Customer Conduct, including a summary of the number of customers to whom the policy was applied during the 2025/26 reporting year.

EXECUTIVE RECOMMENDATION:
That the Audit, Risk and Improvement Committee by Simple Majority to Section 7.1C of the *Local Government Act 1995* RESOLVES to:

1. NOTE the information provided below in relation to Council Policy 4.28 Managing Unreasonable Customer Conduct; and
2. REQUIRE the CEO to report back annually to the Audit, Risk and Improvement Committee at the first meeting held after the close of the relevant financial year.

PROPONENT:
The proponent is the City of Greater Geraldton (the City).

BACKGROUND:
The City of Greater Geraldton Council Policy 4.28 – Managing Unreasonable Customer Conduct outlines strategies to address risks to the City's resources, staff wellbeing and productivity arising from an increasing incidence of unreasonable behaviour by a small number of high-demand customers.

The policy objectives are to provide the overarching principles and guidance as the basis for a fair, equitable and transparent mechanism for dealing with unreasonable conduct by customers that will achieve an effective balance between:

- meeting the genuine needs of customers fairly and equitably;
- providing a safe working environment for staff, volunteers and elected members;
- providing a safe experience for customers of the City; and
- ensuring City resources are used efficiently, effectively and equitably in fulfilling its statutory responsibilities and serving the broader community.

In the 2025-26 financial year, the City of Greater Geraldton reports the following:

The number of customers to whom this policy has been applied in 2025-26	1

Instances of unreasonable customer conduct continue to occur however, formal application of Council Policy 4.28 Managing Unreasonable Customer Conduct remains uncommon. The policy was applied once during the reporting period, with communication restrictions imposed and currently remaining in effect. CCTV, security personnel and police intervention, where required, continue to assist in managing customer behaviour and supporting staff safety.

CONNECTED, LIVEABLE, THRIVING, LEADING – ISSUES AND OPPORTUNITIES:

Connected:
This policy exists to ensure that customer interactions with the City are safe, respectful and fair for all. It protects staff from conduct that falls outside acceptable norms, while preserving equitable access to services and creating an environment where constructive engagement can occur. In doing so, it supports the City's commitment to building an inclusive, connected and respectful community.

Liveable:
Proper application of this policy supports a liveable community by promoting a safe, respectful and inclusive environment for all interactions with the City. By addressing behaviours that may negatively impact others, it helps ensure that public spaces and services remain welcoming, accessible and conducive to positive community experiences.

Thriving:
By ensuring unreasonable conduct is managed effectively, the City remains able to deliver high-quality services, maintain operational efficiency and support a productive workforce. In doing so, it underpins a strong local economy by ensuring resources are used wisely, staff can perform at their best and the community benefits from efficient, reliable and business-friendly service delivery.

Leading:
Through the consistent and proportionate application of Council Policy 4.28 – Managing Unreasonable Customer Conduct, the City demonstrates strong organisational leadership. It sets clear expectations for respectful engagement, supports informed decision-making and accountability and reinforces a values-driven approach to governance and service delivery.

Disclosure of Interest:
No Officer involved in the preparation of this report has a declarable interest in this matter.

RELEVANT PRECEDENTS:
It is a requirement of the Audit, Risk and Improvement Committee that the CEO reports back annually on application of application of Council Policy 4.28 Managing Unreasonable Customer Conduct. Also, Council review or amend Council Policies as and when required.

COMMUNITY/COUNCIL MEMBER CONSULTATION:
Council Members approved Version 4 of Council Policy 4.28 Managing Unreasonable Customer Conduct as part of the policy review undertaken in February 2026.

There has been no community consultation on this item.

LEGISLATIVE/POLICY IMPLICATIONS:
Pursuant to section 2.7 of the Local Government Act 1995, the role of Council includes determination of Council Policies:

2.7. Role of council

(1) The council governs the local government's affairs and, as the local government's governing body, is responsible for the performance of the local government's functions.

(2) The council's governing role includes the following —

…

(b) determining the local government's policies;

FINANCIAL AND RESOURCE IMPLICATIONS:
There are currently no financial or resource implications, however, should an incident arise that requires the presence of security, either in the short or long term, this would result in additional costs to the City.

INTEGRATED PLANNING LINKS:

Strategic Theme: Leading	**A progressive City where informed decisions, strong advocacy and an enabling culture drives sustainable regional growth.**
Goal 2	Efficiently and effectively deliver community services and projects, through optimal use of our resources.
Goal 5	Provide the community with clear and accessible information about the City's programs, services and decisions.
Goal 6	Ensure high quality governance activities enabling transparency and accountability.

REGIONAL OUTCOMES:
There are no impacts to regional outcomes.

RISK MANAGEMENT:
Council Policy 4.28 provides a structured framework to identify and manage risks arising from unreasonable customer conduct, supporting staff safety, consistent responses and the efficient use of City resources. Through clear processes, escalation pathways and regular review of imposed restrictions, the

policy strengthens the City's overall risk management approach while maintaining fair and equitable access to services.

ALTERNATIVE OPTIONS CONSIDERED BY CITY OFFICERS:
No alternative options were considered by City Officers.

AC187 IBIS ERP PROJECT UPDATE

AGENDA REFERENCE:	**D-26-081970**
AUTHOR:	**D Duff, Manager ERP Project**
EXECUTIVE:	**P Radalj, Director Corporate Services**
DATE OF REPORT:	**3 July 2027**
FILE REFERENCE:	**GO/11/0020-003**
ATTACHMENTS:	**No**

EXECUTIVE SUMMARY:
The purpose of this report is to provide the Audit, Risk and Improvement Committee with a progress update on the IBIS ERP Project.

EXECUTIVE RECOMMENDATION:
That the Audit, Risk and Improvement Committee by Simple Majority pursuant to Section 7.1CA of the *Local Government Act 1995* RESOLVES to:

1. NOTE the progress and near term objectives of the IBIS ERP Project.

PROPONENT:
The proponent is the City of Greater Geraldton (the City).

BACKGROUND:
Officers last reported on the IBIS ERP Project at the Audit, Risk and Improvement Committee meeting of 24 February 2026. At that time, several key objectives were identified for delivery over the subsequent reporting period. Progress against those objectives is outlined below.

Safety Management (Hazard and Incident Reporting) – Delivered
The Hazard and Incident Reporting solution was successfully deployed on 1 April 2026. In parallel, five additional Work Health and Safety (WHS) forms were implemented, including Leadership Walks, 5 Whys Investigations, Take Five Assessments, Workplace Inspections, and Safe Work Observations.
The deployment also included operational and management dashboards to support oversight, reporting and analysis by the Safety team and responsible managers. Adoption across the organisation has been positive, with users reporting improved visibility, consistency and ease of reporting.

Revenue Management Modules – Progressing Toward User Acceptance Testing
Initial configuration of the Revenue Management modules, including Property, Names, Debtors (sundry) and Cash Receipting, is approaching completion. Planning is now commencing for User Acceptance Testing (UAT), training activities and deployment during the second half of 2026.

Delivery of the Revenue Management capability remains a key dependency for the Compliance Management modules and therefore continues to be closely monitored.

Data migration preparation and testing activities remain ongoing. Given the critical nature of property and rating information, additional oversight is being applied to support the transition and ongoing synchronisation of data between SynergySoft and IBIS.

Compliance Management Modules (package 1) – In Progress
Configuration activities for the Compliance Management suite, including Permits and Licences, Animals, Infringements and Enforcement functions, have commenced.

Initial prototypes were demonstrated to Regulatory Services staff during June 2026. Officers have subsequently been provided access to both desktop and mobile versions of the prototypes to undertake functional testing and provide feedback throughout July 2026. This process will inform final solution design and configuration prior to progression to full build activities.

Data preparation, cleansing and mapping activities continue to progress.

Request Management and Digital Experience Platform (DxP) – In Progress
Configuration of the Digital Experience Platform (DxP) continues to progress steadily. Regulatory Services staff have been provided with an early preview of the platform as part of the prototype evaluation process.

Progress on Request Management was temporarily impacted by the reassignment of a key project resource to support the delivery of the Safety Management implementation. This position subsequently became vacant following the employee's departure in April 2026. Recruitment was completed in late June 2026, and Request Management configuration activities have now resumed.

While this has resulted in some schedule impacts, the resource gap has been addressed, and delivery activities are progressing**.**

Integrated Works Management – Fleet Operations – Delivered
Enterprise Asset Management (EAM) – In Progress
The Fleet Works Management solution, including integration with Payroll/Timesheets and Purchasing processes, has been successfully deployed. Feedback from Fleet operations has been positive, and lessons learned from the implementation are being incorporated into subsequent EAM deployments.

Following the successful Fleet implementation, the Facilities Maintenance team transitioned from Assetic Cloud to IBIS for reactive maintenance management and is currently implementing scheduled maintenance functionality. As a result, Assetic Cloud has now been retired, supporting the program's system consolidation objectives.

As implementation activities have progressed, several business decisions and service delivery considerations have been identified that require resolution

before broader EAM integration activities can continue. In addition, resource capacity constraints have presented challenges to the delivery schedule.
Officers are currently working with the Executive Management Team, business stakeholders and external consultants to determine an appropriate delivery approach for the remaining EAM scope and to ensure implementation risks are effectively managed.

Project Priority Objectives – Next 6 Months (July–December 2026)
To support the planned go-live of the Revenue Management, Compliance Management package 1, Request Management and Digital Experience Platform (DxP) solutions in the first quarter of 2027, project activities over the next six months will predominantly focus on solution readiness, data integrity, user adoption and implementation planning.

- Complete solution configuration across all three workstreams (excl Rates).
- Finalise data migration and cutover planning activities (excl Rates transactions).
- Conclude User Acceptance Testing for core functionality.
- Achieve implementation readiness for training and deployment during the first quarter of 2027**.**

Those objectives are in conjunction with:

- Address and progress broader EAM and integration delivery
- Integrate GiS spatial data to support Asset Management and Property and Rating (Compliance modules)
- Support day to day business as usual activities

CONNECTED, LIVEABLE, THRIVING, LEADING –
ISSUES AND OPPORTUNITIES:

Connected:
A modern ERP system enhances connectivity by integrating data across departments, enabling timely and coordinated responses that make public spaces safer, services more inclusive, and residents more engaged.

Liveable:
A modern ERP promotes a more liveable City through improved service delivery and an expansion of online services.

Thriving:
There are no adverse impacts.

Leading:

An ERP makes Council operations more transparent, accountable, and data driven, ensuring decisions reflect community priorities and resources are used wisely.

Disclosure of Interest:
No Officer involved in the preparation of this report has a declarable interest in this matter.

RELEVANT PRECEDENTS:
An IBIS ERP Project update was provided to the Audit Committee at a previous meeting held 24 February 2026.

COMMUNITY/COUNCIL MEMBER CONSULTATION:
Council awarded RFT 2122 03 ERP Software Replacement to TechnologyOne at its meeting 29 March 2022 (Item No. CCS682).

LEGISLATIVE/POLICY IMPLICATIONS:
There are no legislative or policy implications.

FINANCIAL AND RESOURCE IMPLICATIONS:
$3.25million has been allocated in the 2026-27 Annual Budget for IBIS project implementation which includes both internal and external resourcing costs. Expenditure for the 2025-26 financial year currently sits at $2.5million against a budget of $2.9 million.

INTEGRATED PLANNING LINKS:

Strategic Theme: Leading	**A progressive City where informed decisions, strong advocacy and an enabling culture drives sustainable regional growth.**
Goal 2	Efficiently and effectively deliver community services and projects, through optimal use of our resources.
Goal 3	Financial sustainability, actively seeking and leveraging external funding to deliver for the community.
Goal 5	Provide the community with clear and accessible information about the City's programs, services and decisions.

REGIONAL OUTCOMES:
There are no impacts to regional outcomes.

RISK MANAGEMENT:
The IBIS ERP Project continues to progress, with several major components now operational and delivering business benefits. The primary risks currently being monitored include:

- Resource availability and business capacity to support testing, training and implementation activities.
- Data migration quality and integrity, particularly in relation to names, land/property, and regulatory information.

- Interdependencies between the Revenue Management, Compliance Management and EAM workstreams.
- Timely resolution of outstanding business process and governance decisions required for the remaining EAM scope.

Management considers these risks to be understood and actively managed through the project's governance framework. No issues have been identified at this time that would prevent achievement of the program's strategic objectives; however, some schedule adjustments will be required as implementation sequencing and organisational capacity are balanced against risk and operational priorities.

ALTERNATIVE OPTIONS CONSIDERED BY CITY OFFICERS:
No alternative options were considered by City Officers. This report is provided to the Audit, Risk and Improvement Committee as an update only

AC188 FRAUD AND CORRUPTION CONTROL POLICY AND PLAN REVIEW 2026

AGENDA REFERENCE:	**D-26-081929**
AUTHOR:	**N Jane, Chief Financial Officer and L Maldea, Manager Corporate Compliance**
EXECUTIVE:	**P Radalj, Director Corporate Services**
DATE OF REPORT:	**10 July 2026**
FILE REFERENCE:	**GO/11/0020**
ATTACHMENTS:	**Yes (x4)** **A. Council Policy 4.22 Fraud and Corruption Control** **B. Comparison Table – Council Policy 4.22 Fraud and Corruption Control** **C. Corruption and Control Plan 2026**

EXECUTIVE SUMMARY:
The purpose of this report is to seek Audit, Risk and Improvement Committee endorsement of the revised Council Policy 4.22 Fraud and Corruption Control Policy and Fraud and Corruption Control Plan 2026.

EXECUTIVE RECOMMENDATION:
That the Audit, Risk and Improvement Committee by Simple Majority pursuant to Section 7.1CA of the *Local Government Act 1995* RESOLVES to:

1. NOTE the status of the fraud and corruption control review currently being undertaken;
2. ENDORSE the Council Policy 4.22 Fraud and Corruption Control Policy and Fraud and Corruption Control Plan 2026 for Council approval at the next Ordinary Meeting of Council.
3. ACKNOWLEDGE that further work is being undertaken and request an update at the next Audit, Risk and Improvement Committee Meeting.

PROPONENT:
The proponent is the City of Greater Geraldton (the City).

BACKGROUND:
The City adopted its current Fraud and Corruption Control Plan in 2022. The Plan is reviewed on a biennial basis and forms part of the City's broader governance, risk management and integrity framework. The Plan establishes the City's approach to fraud and corruption prevention, detection, reporting and response.

In 2025, AMD Chartered Accountants (CGG appointed internal auditors) completed a broader review of the City's Fraud and Corruption Control Framework, including a gap analysis against Australian Standard AS8001:2021, the Auditor General's Better Practice Guides, and comparable local government frameworks. AMD identified several opportunities to

strengthen the existing framework and recommended that these be considered as part of the next review of the Plan.

Council Policy 4.22 Fraud and Corruption Control
In conjunction with the review of the Fraud and Corruption Control Plan, the revised Council Policy 4.22 Fraud and Corruption Control (the Policy) has undergone a comprehensive review to align with contemporary governance practices and the AMD review.

The revised Policy represents a significant shift from a detailed operational policy to a higher-level governance policy which establishes the City's commitment, principles and expectations regarding fraud and corruption control. Operational and procedural content has been relocated to the associated Fraud and Corruption Control Plan, which now provides the detailed framework for implementation, prevention, detection and response activities.

Policy Key Changes
The Policy transitions from a detailed operational document to a strategic governance policy that:

- clearly articulates the City's commitment to fraud and corruption control;
- establishes governance expectations and accountability measures;
- aligns with current legislative requirements and best practice standards;
- complements the revised Fraud and Corruption Control Plan 2026; and
- implements key recommendations arising from the 2025 Internal Audit review.

This approach provides a clearer distinction between policy direction and operational implementation, resulting in a more robust and contemporary fraud and corruption control framework for the City.

Fraud and Corruption Control Plan 2026
The Fraud and Corruption Control Plan 2026 (the 2026 Plan) has been substantially revised to strengthen governance, accountability, fraud awareness, risk management and response mechanisms and to better align with Australian Standard AS8001:2021 Fraud and Corruption Control, the City's Risk Management Framework and contemporary local government governance practices.

Many of the recommendations arising from the AMD audit have been incorporated into the 2026 Plan, including updated legislative references, expanded governance responsibilities, strengthened oversight arrangements, increased training and awareness requirements, improved fraud response and recovery provisions, and clearer alignment with the City's integrity framework.

Several recommendations identified in the AMD report remain under consideration and are proposed to be addressed through supporting procedures, ongoing policy review processes and operational improvement initiatives rather than inclusion within the 2026 Plan itself. These include the use of data analytics, fraud incident registers, fidelity guarantee insurance monitoring, annual declarations of compliance and anonymous reporting

mechanisms. City Officers will continue to work in this space and regularly update ARIC of progress.

The 2026 Plan represents a significant maturity improvement in the City's fraud and corruption control framework.

Governance and Accountability
The 2026 Plan broadens application of the framework to include Council Members, appointed committee members and external parties in addition to employees. This reflects a whole-of-organisation approach to fraud and corruption control. The 2026 Plan introduces a significantly expanded governance framework including defined responsibilities for:

- Council Members;
- Elected and unelected Committee Members;
- Audit, Risk and Improvement Committee;
- Chief Executive Officer;
- Director Corporate Services;
- Chief Financial Officer;
- Manager Corporate Compliance;
- Directors, Managers and Supervisors;
- Public Interest Disclosure Officers; and
- Human Resources

This addresses AMD's recommendation to strengthen accountability and clearly define responsibilities for fraud and corruption control across the organisation.

Training and Awareness
AMD identified the absence of a formal fraud awareness training framework for employees and elected members. A Fraud and Corruption Awareness online course has been developed and rolled out to all City staff, council members, and elected and unelected committee members. At the time of writing this report 292 of 452 employees and 4 of 9 council members completed the course.

Fraud Response and Recovery
The 2026 Plan introduces new provisions relating to:

- management of allegations;
- independent investigations;
- confidentiality requirements;
- referral to police and external agencies;
- recovery of losses;
- disciplinary responses; and
- internal control reviews following incidents.

This addresses several AMD suggestions relating to response, reporting and recovery arrangements.

AMD Recommendation Status

Recommendation	Status
Governance roles and accountability	Addressed
Council and committee member involvement	Addressed
ARIC oversight responsibilities	Addressed
Updated legislation and standards	Addressed
Training and awareness framework	Largely addressed
Expanded fraud examples and risk guidance	Addressed
Timesheet manipulation fraud risk	Addressed
Response and recovery provisions	Addressed
Stand-alone fraud policy approach	Addressed

The following recommendations remain under consideration as ongoing work is being undertaken to address supporting governance and operational processes as recommended by AMD:

- annual fraud risk reassessment requirement
- annual employee declarations
- anonymous reporting mechanisms
- fraud incident register
- data analytics controls
- fidelity guarantee insurance monitoring
- enhanced conflict of interest management controls

Annexure 2 of the 2022 Plan has been removed and will be revised to form part of an internal annual fraud risk self-assessment and reported annually to ARIC.

CONNECTED, LIVEABLE, THRIVING, LEADING – ISSUES AND OPPORTUNITIES:

Connected:
There are no adverse impacts.

Liveable:
There are no adverse impacts.

Thriving:
There are no adverse impacts.

Leading:
The 2026 Plan and revised Policy represent a significant maturity improvement in the City's fraud and corruption control framework.

Disclosure of Interest:
No Officer involved in the preparation of this report has a declarable interest in this matter.

RELEVANT PRECEDENTS:
AC165 – Fraud and Corruption Control Plan Review 2025 – 20 May 2025

AC152 – Strategic Internal Audit Plan 2021-2025 – 18 February 2025
AC143 – Fraud and Corruption Control Plan Audit 2022 – 23 January 2024
AC118 – Fraud and Corruption Control Plan Audit 2021 – 22 February 2022

COMMUNITY/COUNCIL MEMBER CONSULTATION:
There has been no community/Council Member consultation.

LEGISLATIVE/POLICY IMPLICATIONS:
The 2026 Plan supports compliance with:

- Local Government Act 1995;
- Corruption, Crime and Misconduct Act 2003;
- Corruption, Crime and Misconduct Amendment Act 2024;
- Public Interest Disclosure Act 2003;
- Public Sector Management Act 1994;
- State Records Act 2000;
- Freedom of Information Act 1992; and
- Australian Standard AS8001:2021 Fraud and Corruption Control.

FINANCIAL AND RESOURCE IMPLICATIONS:
There are no financial or resource implications. The review and associated obligations form part of City Officer's normal duties.

INTEGRATED PLANNING LINKS:

Strategic Theme: Leading	**A progressive City where informed decisions, strong advocacy and an enabling culture drives sustainable regional growth.**
Goal 2	Efficiently and effectively deliver community services and projects, through optimal use of our resources.
Goal 3	Financial sustainability, actively seeking and leveraging external funding to deliver for the community.
Goal 4	Continued focus on strong advocacy to ensure that Federal and State projects, programs and funding are aligned with our community's priorities.
Goal 6	Ensure high quality governance activities enabling transparency and accountability.

REGIONAL OUTCOMES:
There are no impacts to regional outcomes.

RISK MANAGEMENT:
Implementation of the revised Plan strengthens the City's fraud and corruption control framework by:

- improving governance oversight;
- clarifying responsibilities and accountability;
- increasing fraud awareness and training;
- strengthening investigation and response arrangements;

- improving legislative compliance; and
- aligning fraud and corruption controls with the City's Risk Management Framework

The key risk associated with not adopting the revised 2026 Plan is that the City’s framework may not fully reflect contemporary governance expectations, current legislative requirements and opportunities for continuous improvement identified through the 2025 internal audit review.

ALTERNATIVE OPTIONS CONSIDERED BY CITY OFFICERS:
No alternative options were considered by City Officers.

City of Greater Geraldton Council Policy
4.22 FRAUD AND CORRUPTION CONTROL

STRATEGIC THEME

Leading

OBJECTIVES

The purpose of this policy is to demonstrate and communicate the City's commitment to the prevention, deterrence, detection, and investigation of all forms of fraud and corruption.

POLICY STATEMENT

The City is committed to the highest possible standards of openness, probity and accountability in its operations. The City has zero tolerance to fraud or corruption. Suspected fraud or corruption will be reported, investigated and resolved in accordance with this policy and associated Fraud and Corruption Control Plan.

The prevention and detection of fraud and corruption is a collective responsibility of all persons engaged, or closely associated, with the City, in any capacity.

This policy applies to all City employees, contractors, volunteers, elected members, and elected and non-elected committee members, and third parties such as consultants, contractors, and suppliers. The City requires all parties to report suspected fraudulent or corrupt activity.

POLICY DETAILS

1. Fraud and Corruption Control Framework

    1.1. Appetite

        1.1.1. Pursuant to Council Policy 4.7 Risk Management, the City will not tolerate fraud and/or corrupt conduct.

    1.2. Organisational Structure

        1.2.1. The City's organisational structure provides clearly defined responsibilities and appropriate segregation of duties and controls within systems, particularly financial and procurement, that inhibits opportunities for fraud to occur. The zero-tolerance approach is set by Council and passed through the organisation and community by Chief Executive Officer and Executive Management Team.

        1.2.2. The structure includes a commitment to an independent internal audit function and a proactive Audit, Risk and Improvement Committee (ARIC). ARIC receives reports from the Chief Executive Officer on the appropriateness and effectiveness of systems and procedures in relation to risk management, internal control, and legislative compliance.

        1.2.3. The Council maintains appropriate resources to implement fraud and corruption prevention, detection, and response strategies pursuant to the Fraud and Corruption Control Plan.

        1.2.4. The CEO is required to notify the Public Sector Commission of suspected minor fraud or corruption, or the Corruption and Crime Commission if serious fraud or corruption is suspected.

1.2.5. The City shall maintain a fidelity guarantee insurance policy that provides insurance against the risk of loss arising from internal fraudulent conduct.

1.3. Policies and Procedures

1.3.1. Elected members lead an ethical organisational culture through compliance with the *Local Government (Model Code of Conduct) Regulations 2021* and adopting the City's Code of Conduct for Council Members, Committee Members and Candidates.

1.3.2. Employees covered by the Employee Code of Conduct are expected to comply with its requirements, not engage in any fraudulent, corrupt, or illegal behaviour, and report any information about actual or potential fraudulent, corrupt or illegal activities.

1.3.3. The City expects goods and service providers and contractors to adhere to the City's Code of Business Ethics with any dealings with the City and its staff.

1.4. Reporting and Responding

1.4.1. The City maintains multiple avenues for reporting suspected acts of fraud and corruption and protects those who report suspected acts consistently with the requirements of the Public Interest Disclosure Act 2003.

1.4.2. Any person may make an appropriate disclosure of public interest information to the City which can be made anonymously.

1.4.3. The City handles investigations with confidentiality pursuant to the Fraud and Corruption Control Plan.

1.4.4. The City will reasonably seek to recover losses suffered through acts of fraud and corruption.

1.5. Fraud and Corruption Control Plan

1.5.1. The City's adopted Fraud and Corruption Plan is compliant with Australian Fraud and Corruption Standard AS8001:2021 Fraud and Corruption Control and is reviewed biennially.

KEY TERM DEFINITION

Corruption – defined by Australian Standard AS8001-2021 as "Dishonest activity in which a person associated with an organisation acts contrary to the interest of the organisation and abuses their position of trust in order to achieve personal advantage or advantage for another person or organisation."

Fraud – defined by Australian Standard AS8001-2001 as "Dishonest activity causing actual or potential gain or loss to any person or organisation including theft of money or other property by persons internal and/or external to the organisation and/or where deception is used at the time, immediately before or immediately following the activity."

Minor misconduct – defined by section 4(d) of the Corruption, Crime and Misconduct Act 2003 (WA) occurs if a public officer engages in conduct that:

a) adversely affects, or could adversely affect, directly or indirectly, the honest or impartial performance of the functions of a public authority or public officer, whether the public officer was acting in their public officer capacity at the time of engaging in the conduct; or
b) constitutes or involves the performance of his or her functions in a manner that is not honest or impartial; or

c) involves the misuse of information or material that the public officer has acquired in connection with his or her functions as a public officer, whether the misuse is for the benefit of the public officer or the benefit or detriment of another person.

Serious misconduct – as defined by the *Corruption, Crime and Misconduct Act 2003 (WA)* is when a public officer:

a) acts corruptly or corruptly fails to act in the course of their duties; or
b) corruptly takes advantage of their position for the benefit or detriment of any person; or
c) commits an offence which carries a penalty of two or more years imprisonment.

Public interest information – as defined by the *Public Disclosure Act 2003*, means information that tends to show, in relation to its public function, a public authority, a public officer, or a public sector contractor is, has been, or proposes to be, involved in:

a) improper conduct; or
b) an act or omission that constitutes an offence under a written law; or
c) substantial unauthorised or irregular use of, or substantial management of, public resources; or
d) an act done or omission that involves a substantial and specific risk of:
   i. injury to public health; or
   ii. prejudice to public safety; or
   iii. harm to the environment; or
   iv. a matter of administration that can be investigated under section 14 of the Parliamentary Commissioner Act 1971

Zero tolerance approach means that any allegation, suspicion or incidence of fraudulent, corrupt and/or misconduct behaviours are unacceptable, will not be ignored, and will be investigated.

ROLES AND RESPONSIBILITIES

The Chief Financial Officer and Manager Corporate Compliance are responsible for reviewing this Policy.

The Director Corporate Services is the Executive Sponsor for the associated Control Plan.

WORKPLACE INFORMATION

Local Government Act 1995
Local Government (Model Code of Conduct) Regulations 2021
Public Interest Disclosure Act 2003
Corruption, Crime and Misconduct Act 2003
Australian Standard AS 8001-2021 Fraud and Corruption Control
City of Greater Geraldton Fraud and Corruption Control Plan
Code of Conduct – Council Members, Committee Members and Candidates
Code of Conduct – Employees
Risk Management Policy and Framework

POLICY ADMINISTRATION

Directorate		Officer	Review Cycle	Next Due
Corporate Services		Chief Financial Officer and Manager Corporate Compliance	Biennial	2028
Version	**Decision Reference**	**Synopsis**		
5.	CSXXX Date	Policy Review		

COUNCIL POLICY COMPARISON TABLE

COUNCIL POLICY 4.22 FRAUD AND CORRUPTION CONTROL

CURRENT POLICY CONTENT	PROPOSED CONTENT	CHANGE NOTES	COUNCIL COMMENTS
STRATEGIC THEME Leading	**STRATEGIC THEME** Leading	Click or tap here to enter text.	Click or tap here to enter text.
OBJECTIVES The purpose of this policy is to demonstrate and communicate the Council's commitment to the prevention, deterrence, detection and investigation of all forms of fraud and to establish guidelines for the writing off of debts and waiving of fees and charges.	**OBJECTIVE** The purpose of this policy is to demonstrate and communicate the City's commitment to the prevention, deterrence, detection, and investigation of all forms of fraud and corruption.	This Policy had previously included "Write-Off Debts, Waive Fees and Charges". City Officers recommend, based on audit improvement recommendations, that a standalone Fraud and Corruption Control Policy is endorsed by Council.	Click or tap here to enter text.
POLICY STATEMENT This policy applies to all City employees, contractors, volunteers, elected members, and elected members.	**POLICY STATEMENT** The City is committed to the highest possible standards of openness, probity and accountability in its operations. The City has zero tolerance to fraud or corruption. Suspected fraud or corruption will be reported, investigated and resolved in accordance with this policy and associated Fraud and Corruption Control Plan. The prevention and detection of fraud and corruption is a collective responsibility of all persons engaged, or closely associated, with the City, in any capacity. This policy applies to all City employees, contractors, volunteers, elected members, and elected and non-elected committee members, and third parties such as consultants, contractors, and suppliers. The City requires all parties to report suspected fraudulent or corrupt activity.	Includes a high-level standalone statement showing the City's commitment to fraud and corruption control. Broadens the applicability of the policy and clarifies responsibilities.	Click or tap here to enter text.
POLICY DETAILS 1. Fraud Control As fraud constitutes a significant risk to any organisation, it is appropriate that a culture of ethical conduct be developed to recognise and avoid fraud and to deal appropriately with any cases of fraud. Fraud can lead to financial loss, bad publicity for the City and loss of public confidence in the way that public money and other resources are being used. It is therefore important that the City has robust systems and procedures in place to ensure that the risk of impropriety is minimised, as far as possible, that there is a process in place to enable fraud to be adequately reported and that where instances of fraud do occur, there is a prompt and effective response to them. 1.1. Fraud 1.1.1. Fraud is defined as "wrongful or criminal deception intended to result in financial or personal gain". Fraud is a deliberate act by an individual or group of individuals and is therefore always intentional and dishonest. 1.1.2. Internal fraud refers to fraudulent acts undertaken by Councillors and employees. Examples of such fraud would include: falsification of expenses and wages claims, theft	**POLICY DETAILS** 1. **Fraud and Corruption Control Framework** 1.1. Appetite 1.1.1. Pursuant to Council Policy 4.7 Risk Management, the City will not tolerate fraud and/or corrupt conduct. 1.2. Organisational Structure 1.2.1. The City's organisational structure provides clearly defined responsibilities and appropriate segregation of duties and controls within systems, particularly financial and procurement, that inhibits opportunities for fraud to occur. The zero-tolerance approach is set by Council and passed through the organisation and community by Chief Executive Officer and Executive Management Team. 1.2.2. The structure includes a commitment to an independent internal audit function and a proactive Audit, Risk and Improvement Committee (ARIC). ARIC receives reports from the Chief Executive Officer on the appropriateness and effectiveness of systems and	A lot of the information has been removed as it is included in the revised Fraud and Corruption Control Plan. The information is outlined in greater detail in the Plan. The Policy maintains the most important principles of fraud and corruption control and sets the framework by which the City prevents and detects fraud and corruption.	Click or tap here to enter text.

of cash and alteration of records to conceal the deficiency, falsification of invoices for payment, failure to account for monies collected, falsification of timesheets and time cards, dealing inappropriately with benefits claims of friends or relatives.

1.1.3. It is also worth noting that there may, in some instances, be potential for those in positions of trust within the City to perpetrate frauds against third parties. The City has the responsibility for the integrity of staff employed in such positions of trust.

1.1.4. External fraud is defined as fraud committed against the City by persons outside of the organisation. Examples include false statements in applications for City programs and applications for grants or false invoices for goods or services.

1.1.5. Fraud and other similar irregularities includes, but is not limited to:

- Forgery or alteration of cheques, invoices, computer records and other documents;
- Any misappropriation of funds, securities, supplies or any other asset;
- Any irregularity in the handling or reporting of money transactions;
- Misappropriation of furniture, fixtures and equipment;
- Seeking or accepting anything of material value from vendors, consultants or contractors doing business with the City;
- Unauthorised use or misuse of City property, equipment, materials or records;
- Any computer related activity involving the alteration, destruction, forgery or manipulation of data for fraudulent purposes or misappropriation of Council owned software;
- Any claim for reimbursement of expenses that are not made for the exclusive benefit of City;
- The intentional distortion of financial statements or other records by persons internal or external to the organisation which is carried out to conceal the misappropriation of assets or otherwise for gain;
- Providing false or misleading information related to financial interests and disclosure statements;
- Any similar or related irregularity.

1.2. Roles and Responsibilities

1.2.1. Councillors

Councillors have a duty to ensure that City assets are safeguarded from fraud and abuse and to ensure that Council's powers, duties and responsibilities are exercised in an open, fair and proper manner to the highest standards of probity.

These issues need to be borne in mind when considering reports, making decisions and scrutinising Council's activities.

Councillors should endorse and support all policies and measures taken to prevent, deter, detect and resolve instances, or suspected instances, of fraud throughout the City.

1.2.2. Chief Executive Officer

The Chief Executive Officer has primary responsibility for the proper management of the City's resources and the development and implementation of systems and practices to minimise the risk of fraud.

procedures in relation to risk management, internal control, and legislative compliance.

1.2.3. The Council maintains appropriate resources to implement fraud and corruption prevention, detection, and response strategies pursuant to the Fraud and Corruption Control Plan.

1.2.4. The CEO is required to notify the Public Sector Commission of suspected minor fraud or corruption, or the Corruption and Crime Commission if serious fraud or corruption is suspected.

1.2.5. The City shall maintain a fidelity guarantee insurance policy that provides insurance against the risk of loss arising from internal fraudulent conduct.

1.3. Policies and Procedures

1.3.1. Elected members lead an ethical organisational culture through compliance with the *Local Government (Model Code of Conduct) Regulations 2021* and adopting the City's Code of Conduct for Council Members, Committee Members and Candidates.

1.3.2. Employees covered by the Employee Code of Conduct are expected to comply with its requirements, not engage in any fraudulent, corrupt, or illegal behaviour, and report any information about actual or potential fraudulent, corrupt or illegal activities.

1.3.3. The City expects goods and service providers and contractors to adhere to the City's Code of Business Ethics with any dealings with the City and its staff.

1.4. Reporting and Responding

1.4.1. The City maintains multiple avenues for reporting suspected acts of fraud and corruption and protects those who report suspected acts consistently with the requirements of the Public Interest Disclosure Act 2003.

1.4.2. Any person may make an appropriate disclosure of public interest information to the City which can be made anonymously.

1.4.3. The City handles investigations with confidentiality pursuant to the Fraud and Corruption Control Plan.

1.4.4. The City will reasonably seek to recover losses suffered through acts of fraud and corruption.

1.5. Fraud and Corruption Control Plan

1.5.1. The City's adopted Fraud and Corruption Plan is compliant with Australian Fraud and Corruption Standard AS8001:2021 Fraud and Corruption Control and is reviewed biennially.

The Chief Executive Officer, under the *Corruption, Crime and Misconduct Act 2003* must notify the Corruption and Crime Commission or the Public Sector commission if misconduct is suspected.

1.2.3. Leadership Team (Executive Management Team, Managers and Coordinators/Supervisors)

The Leadership Team is responsible for implementing fraud control initiatives and in particular:

- Provide leadership, guidance, training and support to employees in preventing fraud and corruption;
- Identify high fraud risk areas;
- Participate in fraud and corruption risk assessment reviews which are presented to the Audit Committee to assess and provide assurance that the entity has appropriate processes and systems in place;
- Monitor the continued operation of controls;
- Conducting or coordinating investigations into allegations of fraud;
- Complying with legislation and City policies and practices;
- Ensuring staff understand their responsibilities through adequate communication, supervision, written procedures and job descriptions;
- Responding positively to matters raised and advice given by internal and external audit.

Management need to be vigilant in guarding against fraud, be aware of any circumstances which may indicate that there may be a problem and report any such suspicions to the Directors or Chief Executive Officer for an independent investigation or advice.

In carrying out their responsibilities, all managers (and staff) should be conscious of the fact that they are spending public money collected through rates and taxes. This provides an extra responsibility not only to spend it economically and effectively but also fairly.

1.2.4. Staff

Staff are responsible for acting with honesty and integrity in all council activities and must:

- Not use their position with the Council to gain personal advantage or to confer undue advantage, or disadvantage, on any other person or entity.
- Safeguard Council assets against theft, waste or improper use.
- Understand what behaviour constitutes fraud and/ or corruption.
- Familiarise themselves with and adhere to Council's policies and procedures.

Staff have a duty to make management aware of any concerns they have about the conduct of the City's affairs or the use of City assets and resources. Any matters raised by them should be taken seriously and properly investigated. Staff who suspect that fraud has occurred should advise their Line Supervisor, Manager or Director as soon as possible.

The City has prepared Operating Procedures following the introduction of the Public Interest Disclosure Act 2003 which protects "whistleblowers" from unjust recrimination where they have an honest and reasonable suspicion of malpractice and

they act on it. The City, in the interests of probity and good local government, encourages staff to raise matters so that they can be properly investigated.

1.2.5. Internal and External Auditors

1.2.5.1. Internal Audit

Internal Audit has an important role in assisting management in the prevention and detection of fraud by:

- Independently reviewing systems, procedures and controls to ensure that there are adequate safeguards to prevent, deter and detect fraud with particular attention being paid to the review of contracts and computer systems where there is potentially a significant risk;
- Through specific audits and testing of systems, identifying areas of concern;
- Responding to requests for advice from managers on controls to put in systems;
- Independently investigating suspected frauds and irregularities and reporting conclusions to the Audit Committee, management and, where necessary, the Police;
- Producing, and advising on the production, of rules, regulations and policies, which deter fraud.

1.2.5.2. External Audit

External Auditors certify that the City's accounts represent a true and fair view of the City's financial position. In reaching this conclusion, they must satisfy themselves that control systems are sound and that measures are being taken to minimise the chances of fraud.

1.3. Induction Process

The elements of fraud and the responsibility of all staff to not participate in and report fraudulent activity will form part of Council's induction process.

1.4. Development of Fraud Control Plan

Council shall examine its exposure to fraud biennially and shall develop a fraud control plan which will be implemented over the following two years.

1.5. Response to Allegations and Concerns

1.5.1. Allegations and concerns about fraudulent or corrupt activity may come from different sources e.g.

- Members of the public, sometimes anonymously
- Other local authorities
- Councillors
- Council managers or staff
- Internal or external audit reviews

1.5.2. Allegations and concerns about fraudulent activity can be reported to the Chief Executive Officer, Directors, Managers and Line Supervisors and those persons making and/ or raising allegations and concerns must be either willing to put this in writing and/ or have supported evidence to avoid those persons who maliciously and knowingly create a false allegation.

1.5.3. Wherever these concerns come from they must treated seriously and confidentiality

will be respected as far as possible. A thorough investigation will be made of all concerns but the level of resources applied to this will be dependent on the nature of the concern e.g. sums or resources involved, sensitivity of the area, source of concern, evidence provided or available, risk inherent in that area. 1.5.4. For cases of internal fraud, investigations should be closely managed and documented in accordance with City procedures. 1.5.5. At all times confidentiality must be maintained and information disclosed only to those who need to know it, in order not to prejudice any disciplinary or criminal action. 1.6. Actions to be taken when Fraud is Uncovered or Suspected 1.6.1. Investigations into suspected fraudulent activity will be comprehensive and will be based on the principles of independence, objectivity and the rules of natural justice. 1.6.2. Investigations will be conducted by an appropriately skilled and experienced person who is independent of the area in which the alleged fraudulent conduct occurred. 1.6.3. Where there is sufficient evidence of fraud, or there is strong suspicion but internal investigations are unable to obtain further evidence required, the Police should be involved where it is considered in the "Council or public interest". 1.6.4. Determination of the "Council or public interest" will include factors such as the sums or resources involved, the strength of the evidence obtained or available, the potential cost to the Council of pursuing the matter, the sensitivity of the area concerned. Referral to the Police will be the normal course of action unless there is a strong case not to do so. 1.6.5. Where involvement of the Police is not appropriate, the strongest action possible should be taken. This may involve disciplinary action including dismissal and the recovery of any sums of money or resources misappropriated. 1.6.6. At the conclusion of any fraud investigation, systems and procedures will be reviewed and any remedial actions implemented, whether or not there was sufficient evidence to prove any wrongdoing. 1.6.7. Any remedial actions identified from this process shall be recorded in the City's Risk Register and allocated to the relevant manager through his/ her Risk Plan. 1.6.8. Monitoring of remedial actions will be undertaken by the City's Internal Auditors on an annual basis. 1.6.9. A fraud, integrity and conduct register will be maintained by the Manager Corporate Services. 1.7. Training Biennial training will be given to all staff in the principles of fraud, the reporting of fraud and the process involved in investigating suspected fraud. 1.8. Insurance The City shall maintain a fidelity guarantee insurance policy that provides insurance against the risk of loss arising from internal fraudulent conduct.			
KEY TERM DEFINITIONS Click or tap here to enter text.	**KEY TERM DEFINITIONS** Corruption – defined by Australian Standard AS8001-2021 as "Dishonest activity in which a person associated with an organisation acts contrary to the interest of the	Definitions added	Click or tap here to enter text.

	organisation and abuses their position of trust in order to achieve personal advantage or advantage for another person or organisation." Fraud – defined by Australian Standard AS8001-2001 as "Dishonest activity causing actual or potential gain or loss to any person or organisation including theft of money or other property by persons internal and/or external to the organisation and/or where deception is used at the time, immediately before or immediately following the activity." Minor misconduct – defined by section 4(d) of the Corruption, Crime and Misconduct Act 2003 (WA) occurs if a public officer engages in conduct that: a) adversely affects, or could adversely affect, directly or indirectly, the honest or impartial performance of the functions of a public authority or public officer, whether the public officer was acting in their public officer capacity at the time of engaging in the conduct; or b) constitutes or involves the performance of his or her functions in a manner that is not honest or impartial; or c) constitutes or involves a breach of trust placed in the public officer because of his or her office or employment as a public officer; or d) involves the misuse of information or material that the public officer has acquired in connection with his or her functions as a public officer, whether the misuse is for the benefit of the public officer or the benefit or detriment of another person. Serious misconduct – as defined by the *Corruption, Crime and Misconduct Act 2003 (WA)* is when a public officer: a) acts corruptly or corruptly fails to act in the course of their duties; or b) corruptly takes advantage of their position for the benefit or detriment of any person; or c) commits an offence which carries a penalty of two or more years imprisonment. Public interest information – as defined by the *Public Disclosure Act 2003*, means information that tends to show, in relation to its public function, a public authority, a public officer, or a public sector contractor is, has been, or proposes to be, involved in: a) improper conduct; or b) an act or omission that constitutes an offence under a written law; or c) substantial unauthorised or irregular use of, or substantial management of, public resources; or d) an act done or omission that involves a substantial and specific risk of: i. injury to public health; or ii. prejudice to public safety; or iii. harm to the environment; or		

	iv. a matter of administration that can be investigated under section 14 of the Parliamentary Commissioner Act 1971. Zero tolerance approach means that any allegation, suspicion or incidence of fraudulent, corrupt and/or misconduct behaviours are unacceptable, will not be ignored, and will be investigated.		
ROLES AND RESPONSIBILITIES The Chief Financial Officer is responsible for implementing and maintaining this Policy.	**ROLES AND RESPONSIBILITIES** The Chief Financial Officer and Manager Corporate Compliance are responsible for reviewing this Policy. The Director Corporate Services is the Executive Sponsor for the associated Control Plan.	Manager Corporate Compliance has been added as a responsible officer due to involved in fraud and corruption control.	Click or tap here to enter text.
WORKPLACE INFORMATION Statutory Compliance *Local Government Act 1995* *Local Government (Rules of Conduct) Regulations 2007* *Public Interest Disclosure Act 2003* *Corruption, Crime and Misconduct Act 2003* Industry Compliance Australian Standard AS 8001-2008 Fraud and Corruption Control AS 8003 – 2003 Good Governance Principals Organisational Compliance Codes of Conduct (Employees and Councillors) Public Interest Disclosure Policy Risk Management Policy Related Party Disclosures Policy Delegated Authority Council to CEO Delegated Authority CEO to Employees Strategic Community Plan – 4.2 Decision making is ethical, informed and inclusive	**WORKPLACE INFORMATION** *Local Government Act 1995* *Local Government (Model Code of Conduct) Regulations 2021* *Public Interest Disclosure Act 2003* *Corruption, Crime and Misconduct Act 2003* Australian Standard AS 8001-2021 Fraud and Corruption Control City of Greater Geraldton Fraud and Corruption Control Plan Code of Conduct – Council Members, Committee Members and Candidates Code of Conduct – Employees Risk Management Policy and Framework	Addition of Model Code of Conduct Regulations.	Click or tap here to enter text.
POLICY ADMINISTRATION Directorate: Corporate Services Officer: Chief Financial Officer Review Cycle: Biennial Next Due: 2024 Version 4. — Decision Reference: CCS 717 30/08/2022 — Synopsis: Choose an item.	**POLICY ADMINISTRATION** Directorate: Corporate Services Officer: Chief Financial Officer and Manager Corporate Compliance Review Cycle: Biennial Next Due: 2028 Version 5. — Decision Reference: CSXXX Click or tap to enter a date. — Synopsis: Policy Review		

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City of Greater Geraldton
a vibrant future

FRAUD AND CORRUPTION CONTROL PLAN 2026

Contents

FRAUD AND CORRUPTION CONTROL PLAN

1. Introduction

Fraud and corruption are present and growing threats across our society, including local governments. As well as loss of funds, fraud and corruption can result in loss of confidence in government institutions. The community needs to have faith that the public sector is serving them well for democracy to work.

The social contract between ratepayers and local government is threatened when public money is misappropriated or other wrongdoing occurs. It strikes at the core of trust, accountability, and transparency in local government.

The City of Greater Geraldton (the City) is committed to the highest possible standards of openness, probity, and accountability in all its operations. This Fraud and Corruption Control Plan (the Plan) has been developed in line with Australian Standard AS8001-2021 Fraud and Corruption Control and forms an integral part of the City's Risk Management Framework.

In accordance with the City's Risk Management Framework and Risk Management Policy, the City has zero tolerance to fraud, corruption, or misconduct (fraud or corruption). Suspected fraud or corruption will be reported, investigated and resolved in accordance with internal policies and procedures and the Corruption, Crime and Misconduct Act 2003 (and any subsequent amendments). All legal obligations to the principles of procedural fairness will be met.

This Plan is part of the City's overall integrity framework and works alongside:

a) Fraud and Corruption Control Policy
b) Governance Framework
c) Risk Management Framework and Risk Management Policy
d) Code of Conduct for Employees
e) Code of Conduct for Council Members, Committee Members and Candidates
f) Code of Business Ethics

2. Definitions

2.1. Fraud

Fraud is defined by Australian Standard AS8001-2021 as:

"Dishonest activity causing actual or potential gain or loss to any person or organisation including theft of money or other property by persons internal and/or external to the organisation and/or where deception is used at the time, immediately before or immediately following the activity"

Fraud includes any practice that involves deceit or other dishonest means by which a benefit is obtained. The benefits may be obtained by:

a) *Internal fraud* – Fraud where at least one perpetrator is employed by or has a close association with the target organisation and has detailed internal knowledge of the organisation's operations, systems and procedures.
b) *External fraud* – Fraud where no perpetrator is employed by or has a close association with the target organization.

Fraud can take many forms. Certain functions and activities carry inherent fraud risks. For example, procurement fraud is a significant risk in local government due to the high volume of services the City procures from local businesses and the possibility that City employees may have personal or professional relationships with those businesses.

Some other common types of fraud are:

a) Theft or obtaining property, financial advantage or any other benefit by deception;
b) Providing false or misleading information, or failing to provide information where there is an obligation to do so;
c) Causing a loss, or avoiding or creating a liability by deception;
d) Making, using or possessing forged or falsified documents;
e) Unlawful use of computers, vehicles, telephones and other property or services;
f) Manipulating expenses or salaries, including timesheets and leave requests, and
g) Misuse of position.

Types of City services that can be exposed to fraud risk are outlined in Annexure 2 of this Plan.

2.2. Corruption

Corruption is defined by Australian Standard AS8001-2021 as:

"Dishonest activity in which a person associated with an organisation acts contrary to the interest of the organisation and abuses their position of trust in order to achieve personal advantage or advantage for another person or organisation".

Corruption is any conduct that is improper, immoral or fraudulent and may include (but not limited to):

a) conflict of interest;
b) dishonestly using influence;
c) blackmail;
d) failure to disclose gifts or hospitality;
e) acceptance of a bribe;
f) nepotism;
g) misuse of internet or email; and
h) the unauthorised release of confidential, private information or intellectual property.

2.3. Misconduct

Serious misconduct as defined by the *Corruption, Crime and Misconduct Act 2003 (WA)* is when a public officer:

a) acts corruptly or corruptly fails to act in the course of their duties; or
b) corruptly takes advantage of their position for the benefit or detriment of any person; or
c) commits an offence which carries a penalty of two or more years imprisonment.

Minor misconduct as defined by section 4(d) of the *Corruption, Crime and Misconduct Act 2003 (WA)* occurs if a public officer engages in conduct that:

a) adversely affects, or could adversely affect, directly or indirectly, the honest or impartial performance of the functions of a public authority or public officer, whether the public officer was acting in their public officer capacity at the time of engaging in the conduct; or

b) constitutes or involves the performance of his or her functions in a manner that is not honest or impartial; or
c) constitutes or involves a breach of trust placed in the public officer because of his or her office or employment as a public officer; or
d) involves the misuse of information or material that the public officer has acquired in connection with his or her functions as a public officer, whether the misuse is for the benefit of the public officer or the benefit or detriment of another person.

3. Scope

This Plan details the City's intended action in implementing and monitoring fraud and corruption prevention, detection, and response initiatives. This plan has been developed to deliver the objectives of Council Policy 4.22 Fraud and Corruption Control, in compliance with the requirements of the *Australian Fraud and Corruption Standard AS8001-2021*.

Although the Chief Executive Officer (CEO) has overall responsibility to ensure proper controls and systems are in place to prevent fraud or corruption from occurring, and to monitor fraud and corruption risks, all parties are accountable for and have a role to play in fraud and corruption control. The City requires all parties to report suspected fraudulent or corrupt activity.

This Plan applies to:

a) all employees,
b) elected members, elected and unelected committee members, and
c) any external party involved in providing goods and services, with or without payment, to the City, such as contractors, consultants, outsourced service providers, suppliers, and volunteers are accountable for and have a role to play in fraud and corruption control. The City requires all parties to report suspected fraudulent or corrupt activity.

Where a fraud and corruption process has not been defined, the City will draw on the AS 8001 Fraud and Corruption Control Standard and the Office of Auditor General Fraud Risk Management – Better Practice Guide.

4. Purpose

This Plan outlines the City's approach to controlling fraud and corruption through:

- Setting the City's anti-fraud and anti-corruption policies;
- Developing, implementing and maintaining a holistic integrity framework;
- Fraud and corruption control planning;
- Risk management including all aspects of identification, analysis, evaluation, treatment, monitoring, and reporting;
- Awareness training for employees and elected members;
- Establishing clear accountability structures in terms of response and investigation, and
- Enforcement and disciplinary actions.

This Plan has been developed to address fraud and corruption prevention, detection, recovery, monitoring, and reporting. We all have a key responsibility to safeguard against damage and loss through fraud and corruption. We all have an obligation to support efforts to reduce associated risk by behaving with integrity and professionalism in undertaking our respective duties.

Whilst the Plan establishes the City's attitude and approach to fraud and corruption control, the Codes of Conduct set out the high standards of ethical behaviour expected.

5. Planning and Resourcing

5.1. Program for Planning and Review

A review of this Plan is undertaken every two years in conjunction with Council Policy 4.22 Fraud and Corruption Control.

5.2. Roles and Responsibilities

The City's Fraud and Corruption framework includes areas with responsibilities for defining, supporting, controlling and enforcing obligations under the Plan. These include core areas, such as the Council and Audit, Risk and Improvement Committee or individuals responsible for implementing policies, and complementary areas responsible for compliance and audit.

5.2.1. Council Members, elected and unelected committee members

Section 2.7 of the *Local Government Act 1995* states that the Role of Council involves governing the local government's affairs and, as the local government's governing body, is responsible for the performance of the local government's functions. The role of Council involves overseeing the allocation of the local government's finances and resources and determining the local government's policies.

Council operates in accordance with the Local Government Act 1995 and relevant legislation, including in relation to integrity and governance. Council is responsible for setting integrity expectations and embodies these through the City's values, Code of Conduct for Council Members, Committee Members and Candidates, the Risk Management Framework and the Governance Framework. Council approves policy documents as they relate to integrity matters and sets and endorses delegations for specific functions to the Chief Executive Officer and relevant officers. Council endorses the City's Annual Compliance Audit Return and the Terms of Reference for the Audit, Risk and Improvement Committee.

Council Members, elected and unelected committee members have a duty to ensure that City assets are safeguarded from fraud and abuse and to ensure that Council's powers, duties, and responsibilities are exercised in an open, fair and proper manner to the highest standards of probity. These issues need to be borne in mind when considering reports, making decisions and scrutinising Council's activities.

5.2.2. Audit, Risk and Improvement Committee (ARIC)

ARIC acts in accordance with its Terms of Reference and its responsibilities outlined in the Local Government (Audit) Regulations 1996. ARIC monitors the effectiveness of the City's Risk Management Framework which includes fraud and corruption risks, and receives reports on strategic integrity matters, the annual Compliance Audit Return, and considers reports by the Officer of Auditor General including but not limited to the annual external audit. ARIC is responsible for ensuring that regular audits are undertaken in line with this Plan and considers the relevant inclusions in the Strategic Internal Audit Plan to encompass fraud risks. Audits are designed to assist the City to monitor and review its misconduct resistance approach.

The purpose is to identify:

a) work areas where elements of the City misconduct resistance approach may need refreshing or improving; and

b) elements of the misconduct resistance approach that may need attention across the entire organisation.

5.2.3. Chief Executive Officer (CEO)

The CEO has primary responsibility for the effective and economical use of the City's resources and for determining appropriate controls in managing fraud and corruption risks in the City. This responsibility is appropriately delegated to the directors, managers, and line supervisors. The CEO provides regular communication to the organisation about the Fraud and Corruption Control Policy and Plan.

Under the *Corruption, Crime and Misconduct Act 2003*, the CEO is required to notify the Public Sector Commission of suspected minor fraud or corruption, or the Corruption and Crime Commission (CCC) if serious fraud or corruption is suspected.

5.2.4. Director Corporate Services - Executive Sponsor for Fraud and Corruption Control

In recognising that fraud and corruption control are significant business risks, the Director Corporate Services is the City's designated Executive Sponsor for the Plan.

The role of the Executive Sponsor is to champion fraud and corruption control within the City and to oversee the development and implementation of the Plan's effective integration into the City's strategic and corporate planning, and governance and operational systems.

5.2.5. Manager Corporate Compliance and Chief Financial Officer

The Manager Corporate Compliance and the Chief Financial Officer review the Fraud and Corruption Control Policy and Plan to ensure effectiveness. They ensure internal audit programs and procurement procedures adequately address fraud and corruption risks. They coordinate external investigations while consulting with the Director Corporate Services to prepare recommendations for the Chief Executive Officer. They also involve coordinating civil action to recover any losses arising from fraudulent or corrupt conduct and reporting all serious fraud and corruption matters to Western Australia Police and any other appropriate agency in line with organisational and legal obligations. They are responsible for the development of fraud and corruption awareness and education programs and championing the delivery of these alongside Human Resources.

5.2.6. Directors, Managers and Line Managers

Directors, managers and line managers are responsible for ensuring that the Plan is implemented within their business units by:

a) providing leadership, guidance and support of employees in preventing fraud and corruption and modelling ethical behaviour;
b) setting/enforcing disciplinary standards;
c) identifying high fraud and corruption risk areas;
d) identifying specific sources of fraud or corruption risk;
e) participating in fraud and corruption risk assessment reviews;
f) implementing remedial action to address issues identified by the fraud and corruption risk assessment reviews;
g) assessing the cost/benefit of introducing anti-fraud and corruption procedures;
h) developing/modifying practices to reduce fraud and corruption risk;
i) monitoring the continued operation of controls to prevent fraud and corruption;

j) receiving reports of suspected fraud or corruption from employees and taking appropriate steps to address concerns reported;
k) reporting suspected fraud and corruption promptly and maintaining confidentiality; and
l) ensuring the protection of complainants who report fraudulent or corrupt activities.

5.2.7. Employees

All employees have a responsibility to contribute to preventing fraud and corruption by acting ethically, complying with controls, policies and procedures, and reporting suspected incidences of fraudulent or corrupt behaviour through the internal reporting framework (encouraged in the first instance).

The City will provide support and protection to any employee who reports incidences of fraud and corruption.

To be able to actively and positively contribute to fraud and corruption prevention, all employees should:

a) embrace an ethical work-place culture;
b) recognise the value and importance of personally contributing to fraud and corruption prevention;
c) develop an understanding of good work practices, systems and controls;
d) keep abreast of best practices for preventing fraud and corruption;
e) become aware of the different types of fraud and corruption that can occur in the workplace and how to detect them; and
f) report suspected incidences of fraudulent or corrupt conduct in accordance with policies and procedures.

5.2.8. Public Interest Disclosure Officers

Public Interest Disclosure (PID) officers will investigate information disclosed, or cause that information to be investigated, and take action following the completion of the investigation in accordance with the relevant provisions of the Public Interest Disclosure Act 2003 (PID Act).

5.2.9. Human Resources

Human Resources plays a major role in both the management of the grievance and the discipline process. Alongside the Manager Corporate Compliance and Chief Financial Officer, responsibilities also include the championing and delivery of fraud and corruption awareness and education programs.

5.2.10. External Assistance

The Public Sector Commission (PSC) and Corruption and Crime Commission (CCC) work in collaboration with government agencies to educate, prevent, assess and investigate fraud and corruption in the public sector.

The Office of the Auditor General (OAG) is the agency accountable for the audit oversight of the entire sector and provides recommendations to improve local government management practices.

The Department of Local Government, Industry Regulation and Safety (DLGIRS) and the Western Australia Local Government Association (WALGA) provide support to local governments with a range of governance and probity advice services. WALGA provides comprehensive training support to both Council Members and local government employees.

Local Government Insurance Scheme (WA) (LGIS) provides insurance, risk, and governance services to local governments.

6. Fraud and Corruption Prevention

6.1. Integrity Framework

6.1.1. Code of Conduct

This Plan establishes the City's attitude and approach to fraud and corruption control, while the Codes of Conduct set out the high standards of ethical behaviour expected of employees, council members, committee members and candidates.

Council Policy 4.2 Code of Conduct for Council Members, Committee Members and Candidates is prescribed by legislation, endorsed by Council, and takes account of specific roles and requirements. The Employee Code of Conduct sits at an operational level and applies to all employees.

6.1.2. Policies and Procedures

The City has a range of policies and procedures which govern and support the City's day-to-day operations and decision making. Fraud and corruption prevention and detection controls are embedded in the various policies listed in Annexure 1. Council policies are available on the City's website whereas Operational policies are available in the City's record management system and on the Intranet.

6.1.3. Legislation, Standards and Guidance

The City is subject to a wide range of legislation, standards and guidance, including but not limited to:

a) Corruption, Crime and Misconduct Act 2003	b) Corruption, Crime and Misconduct Amendment Act 2024
c) Local Government Act 1995	d) Local Government (Financial Management) Regulations 1996
e) Local Government (Model Code of Conduct) Regulations 2021	f) Local Government (Administration) Regulations 1996
g) Local Government (Functions and General) Regulations 1996	h) Local Government (Audit) Regulations 1996
i) Public Sector Management Act 1994	j) Criminal Code Compilation Act 1913
k) Public Interest Disclosure Act 2003	l) State Records Act 2000
m) Freedom of Information Act 1992	n) AS ISO 31000:2018 Risk Management – Guidelines
o) AS 8001:2021 – Fraud and corruption control	p) Fraud Risk Management – Better Practice Guide (WA OAG)

6.2. Internal Control Systems

All business processes, especially those identified as having a higher risk of fraud and corruption (as listed in Annexure 2), are subject to a rigorous system of internal controls that are documented, reviewed and updated regularly, and understood by relevant employees.

Strong internal controls are important in protecting against fraud and corruption. In many cases where fraud and corruption are detected, it is possible to identify a fundamental control weakness or failure that either allowed the incident to occur or failed to detect it quickly after it occurred.

Line supervisors are responsible for ensuring appropriate work systems, including internal controls, are established and maintained. Managers are to request regular audit reviews which include compliance testing.

6.2.1. Information Security Management System (ISMS)

An ISMS composed of policies, strategy, processes, standards, procedures and plans is important for ensuring a holistic and repeatable business risk-based approach to establish, implement, monitor, review, maintain and improve cyber and information security. Council Policy 4.6 Information Security Management System guides the development of the City's ISMS. The ISMS is developed and implemented with guidance from standards and frameworks such as, but not limited to, ISO 27001, NIST 800-53, Australian Signals Directorate (ASD) information security manual (ISM) & Essential 8 (E8), and Cloud Security Alliance (CSA) Framework for Cloud Computing.

6.2.2. Recordkeeping

The *State Records Act (2000)* states that a recordkeeping plan in respect of a government organisation is a record setting out the matters about which records are to be created by the organisation and how the organisation is to keep its government records. A Council endorsed Recordkeeping policy directs the development and maintenance of the Recordkeeping Plan approved by the State Records Office (SRO). The recordkeeping plan contains policies, procedures and systems to maintain accurate and complete records of business activity.

6.2.3. Risk Assessment

Each department must systematically identify, assess, and review fraud and corruption risks in line with the City's Risk Management Policy and Framework.

The most important outcome of the fraud and corruption risk assessment process is the development of a treatment plan that specifically addresses the risks identified. These measures should be monitored for effectiveness over time. The following key fraud and corruption risks/areas have been identified:

a) Fraudulent/corrupt behaviour by an employee involved in procurement.
b) Fraudulent/corrupt behaviour by an employee involved in issuing approvals, licenses, or authorisations.
c) Fraudulent behaviour by an employee involved in financial transactions (including payroll).
d) Employee claims/receive benefits to which they are not entitled (includes leave, misuse of credit cards. etc.).
e) Contractor/provider paid for goods/services not received.

Refer to Annexure 2 for further guidance on fraud risks.

6.3. Training and Awareness

Mandatory training through the City's Essential Workplace Training course, Fraud and Corruption Awareness, provides every employee with a general awareness of fraud and corruption and how to respond if this type of activity is detected or suspected.

The following training forms part of the City's broader essential training for City employees, and details elements of the City's fraud and corruption management controls.

6.3.1. Orientation Program for Key Services Induction

Stage 1 – Pre-Employment Induction (online)	Stage 2 – Local Induction (face to face)
Stage 3 – Key Services Induction – Human Resources (face to face)	Stage 3 – Key Services Induction – Occupational Safety & Health (face to face)
Stage 3 - Key Services Induction - ICT Services (face to face)	Stage 3 - Key Services Induction - TRIM Training (face to face)
Stage 3 - Key Services Induction - Introduction to Local Government (face to face)	Stage 3 – Key Services Induction – Governance Induction
Stage 3 – Key Services Induction – Procurement Induction	

6.3.2. Essential Workplace Training

Accountable & Ethical Decision Making (online)	CGG Security Awareness Training - Module 4 - Security Beyond email (online)
Fraud and Corruption Awareness (online)	CGG Governance Fundamentals (online)
CGG Security Awareness Training – Module 1 – Email Security (online)	Part 1 - Introduction to Procurement (face to face)
CGG Security Awareness Training - Module 2 - Email Phishing (online)	Part 2 – Contract Management Training (face to face)
CGG Security Awareness Training - Module 3 - Mobile Device (online)	Part 3 - Tender Management (face to face)

6.3.3. Ethics and Conduct Training

Conflict of Interest (online)	Employee Code of Conduct (online)
Fraud and Corruption Awareness (online)	Freedom of Information (WA) (online)
Local Government Gift Declarations webinar (online)	Public Interest Disclosures (WA) (online)
WALGA Decision Making in Practice - Delegations webinar (online)	Business Ethics (online)

6.3.4. Policy Acknowledgement

Policy OP052 – Acceptable Use of Office Equipment, Electronic Communications and the Internet (online)	Code of Business Ethics 2022 (online)
Policy OP033 - Social Media and Online Communications (online)	Policy OP009 - Light Vehicle Use (online)
Policy OP041 – Workplace Health and Safety(online)	Policy OP051 - Make Payments from the Municipal Fund or Trust Fund (online)
Policy OP006 - Mobile Devices (online)	Policy OP011 - Employee Travel and Accommodation (online)
Policy CP4.9 - Procurement of Goods and Services (online)	Policy OP054 - Employee Code of Conduct - Version 4 (online)
Policy OP047 - Grievance Management & Investigation (online)	Policy OP004 - Equal Employment Opportunity (online)
Policy OP043 - Fitness for Work (online)	Policy OP021 – Payroll Governance

Further specialist training is provided to critical City employees that may have specific functions.

6.4. Employment Screening

A National Police Clearance is conducted for senior, management and finance advertised positions, as part of the recruitment process. Some identified positions also require certified evidence of permanent residency in Australia, evidence of qualifications, medical clearance and/or psychological testing. Additional screening is performed via the Pre Employment Checklist for all employees.

Additionally, all City employees with an actual, perceived or potential conflict of interest must, in conjunction with their line manager, develop an action plan for the management of the conflict of interest. City employees must disclose and seek permission to engage in any additional employment either paid or unpaid.

6.5. Supplier and Customer Integrity

While fraud and corruption are often instigated by persons internal to an organisation, it is important to consider that the City may be susceptible to externally instigated fraud or corruption. The risk of fraud and corruption is reduced when the City knows who it is dealing with in all significant commercial transactions, so the credentials, financial health, and integrity of new suppliers or customers is investigated as far as practical.

When procuring goods and/or services, employees are required to seek competitive quotes from potential suppliers. In addition to ensuring that the submitted offers meet the required specifications and represent value for money, the evaluation process is to include an assessment of the supplier and their disclosure requirements. This includes the identity of the supplier and verification of the company's ABN or ACN.

The rigour of these checks and assessments is to be commensurate with the value and/or risk presented by the procurement. When ordering from a WALGA preferred supplier panel, suppliers on the panel have already completed a stringent assessment process undertaken by WALGA.

Concerns regarding a supplier's identity or its representation are to be raised with Procurement & Risk.

7. Fraud and Corruption Detection

7.1. Fraud and Corruption Detection Program

The City relies on a variety of strategies to minimise the opportunity for fraud and corruption or its non-detection, including (but not limited to):

- Vigilance and awareness of all employees
- Internal control systems
- Operational risk management processes
- Procedures for reporting fraud and corruption
- Internal and external audit activities

7.2. Internal Audit

Audit activities play an important role in identifying weaknesses in the fraud and corruption control environment. Where it applies to fraud and corruption control, the Professional Practices Framework of the Institute of Internal Auditors is also taken into consideration for individual audit engagements.

7.3. External Auditor

Australian auditing standards provide for auditing procedures so that the audit will be more likely to detect a material misstatement in financial statements due to fraud or corruption (or error). The external audit function is managed by the Office of the Auditor General.

8. Mechanisms for Reporting

Employees of the City are required to report suspected fraud and corruption, including possible breaches or suspected breaches of the Code of Conduct and Discipline policy, or the Public Sector Code of Ethics.

Employees may report any suspected fraud and corruption internally via:

- Line manager;
- Human Resources;
- PID Officers; or
- Directors/CEO

If the matter is serious and depending on the nature of the suspected fraud or corruption, the City is required to report to an appropriate external agency such as the CCC or the Police.

9. Responding to Fraud and Corruption Incidents

9.1. Response to Allegations

Allegations of fraudulent or corrupt activity may come from different sources

- Members of the public, sometimes anonymously
- Other local authorities
- Council members
- Council managers or staff
- Internal or external audit reviews

9.2. Actions to be taken when Fraud is Uncovered or Suspected

All suspected fraudulent activity will be investigated thoroughly, independently, objectively and in accordance with natural justice.

Investigations will be conducted by an appropriately skilled and experienced person who is independent of the area in which the alleged fraudulent conduct occurred.

Confidentiality will be maintained throughout the process. Information will only be disclosedto those who need to know, to avoid prejudicing against any disciplinary or criminal action.

Referral to the Police will generally be the normal course of action unless there is a strong reason not to proceed in this way.

Police should be involved where there is sufficient evidence of fraud, or where there is strong suspicion, but internal investigations cannot obtain further evidence required, and referral is in the Council or public interest.

In determining whether referral is in the Council or public interest, relevant factors may include:

- the value of money, assets or resources involved
- the strength of the evidence obtained or available
- the likely cost to Council of pursuing the matter; and
- the sensitivity of the area or functions involved.

Where police involvement is not appropriate, the strongest available action should be taken. This may

include disciplinary action up to and including dismissal, and recovery of any money, assets or resources misappropriated.

9.3. Internal Control Review

In each instance where fraud or corruption is detected, the Executive Sponsor for Fraud and Corruption Control will require line management to reassess the adequacy of internal control systems, particularly those directly relating to the fraud or corruption incident and recommend improvements if required.

Improvements identified will be implemented and monitored for effectiveness.

9.4. Investigation and Disciplinary Measures

The City records and reports to appropriate oversight bodies all incidences of fraud and corruption.

ANNEXURE 1 – City Policies

1. Council Policy 1.8 Community Funding Programs
2. Council Policy 2.1 Investments
3. Council Policy 2.5 Economic Development and Investment Attraction
4. Council Policy 2.7 Heavy Haulage Cost Recovery
5. Council Policy 4.1 Council Member Continuing Professional Development and Travel
6. Council Policy 4.2 Code of Conduct for Council Members, Committee Members and Candidates
7. Council Policy 4.6 Information Security Management System
8. Council Policy 4.7 Risk Management
9. Council Policy 4.9 Procurement of Goods and Services
10. Council Policy 4.13 Recordkeeping
11. Council Policy 4.14 Payments to Employees in addition to Contract or Award
12. Council Policy 4.21 Related Party Disclosure
13. Council Policy 4.22 Fraud and Corruption Control
14. Operational Policy 002 Disciplinary Policy
15. Operational Policy 003 Employee Recognition and Reward Program
16. Operational Policy 006 Mobile Devices
17. Operational Policy 007 Employee Induction
18. Operational Policy 008 Learning and Development
19. Operational Policy 009 Light Vehicle Use
20. Operational Policy OP011 Employee Travel and Accommodation
21. Operational Policy OP012 Attraction Recruitment and Selection
22. Operational Policy OP021 Payroll Governance
23. Operational Policy OP023 Petty Cash and Cash Floats
24. Operational Policy OP024 Freedom of Information
25. Operational Policy OP033 Communications and Media
26. Operational Policy OP034 Financial Authorisations
27. Operational Policy 037 Corporate Credit Cards
28. Operational Policy 038 Disposal of Surplus Assets
29. Operational Policy 039 Plant and Equipment Use
30. Operational Policy 044 Negotiated Contract Remuneration
31. Operational Policy 047 Grievance Management and Investigation
32. Operational Policy 051 Make Payments from Municipal Fund or Trust Fund
33. Operational Policy 052 Acceptable Use of Office Equipment, Electronic Communications and the Internet
34. Operational Policy 054 Employee Code of Conduct
35. Operational Policy 059 Fuel Cards
36. Delegation Register City of Greater Geraldton
37. Register of Authorisations
38. Code of Business Ethics
39. Public Interest Disclosure Procedure
40. Supplier Code of Conduct

ANNEXURE 2 – Fraud & Corruption Control Plan Risk Guidance

Types of City services susceptible to fraud risk:

TYPE OF FRAUD	EXAMPLES OF RELATED RISKS
Rate revenue fraud — Fraudulent manipulation of rates to receive a self-benefit.	o Incorrectly claiming discounts (such as pensioner discounts) to benefit employees, friends, family and colleagues. o Making changes to rates details to benefit employees, friends, family and colleagues.
Development applications and rezoning — Frauds relating to development applications and rezoning of land for commercial and residential purposes.	o Misuse of commercially sensitive information; o Providing kickbacks to Councillors or City staff for favourable decisions; o Undeclared conflicts of interest involving Councillors and/or City staff
Service delivery fraud — Frauds relating to the use of City-provided services to which the citizen would not normally be entitled.	o Selling a resident's parking permit to a non-resident; o Oversupplying goods or services to benefit third parties; o Undersupplying to 'skim' goods or services (or time that would normally be devoted to the service).
Compensation fraud — Frauds relating to falsely claiming City responsibility for incidents and accidents and attempting to falsely claim compensation.	o Falsely claiming pedestrian accidents on footpaths or Council premises; o Falsely claiming road quality-related accidents; o Falsely claiming stormwater or drainage-related accidents.
Grants fraud — Frauds relating to grant funds not being used for the intended service delivery objective.	o Overpaying of grants, duplicating payments of grants or having grants claimed multiple times; o Redirecting grant funds to personal accounts; o Poor record-keeping for grants, resulting in misstatement.
Procurement fraud — Frauds relating to the process of acquisition of goods, services and project delivery from third parties.	o Unauthorised use of corporate credit or fuel cards; o Paying claims for goods or services that were not delivered; o Receiving of kickbacks or being involved in bribery, corruption or coercion related to
Travel and allowances fraud — Frauds relating to falsely claiming reimbursement of costs or allowances for which there is no entitlement.	o Making claims for journeys not made or overstating the distance; o Reimbursing expenses not related to City business
Payroll and salary fraud — Frauds relating to claiming pay that doesn't match work performed or conditions of employment.	o Creating 'ghost' employees to receive additional pay; o Falsely claiming overtime payments o Not submitting appropriate leave requests
Employment fraud — Fraud relating to applicants falsely claiming qualifications and skills above their ability.	o Misrepresenting skills, capabilities or qualifications to obtain employment; o Forgery of reference documentation.
Asset fraud —	o Manipulation of asset value or fraudulent asset divestment process for personal gain; o Stealing assets;

Using Council assets for other than official purposes or gaining other personal benefits.	○ Using Council assets without authorisation.
Exploiting council information — Using confidential or commercially sensitive information for personal gain.	○ Falsifying official records; ○ Providing confidential and sensitive information to others for personal gain; ○ Using confidential and sensitive information for personal benefit.

Early warning signs for staff and/or workplaces at risk of fraud

EARLY WARNING SIGNS: PEOPLE	EARLY WARNING SIGNS: AREAS OR ACTIVITIES
Unwillingness to share duties; refusal to take leave.	Financial information reported is inconsistent with key performance indicators.
Refusal to implement internal controls.	Abnormally high and increasing costs in a specific cost centre function.
The replacement of existing suppliers upon appointment to a position or unusually close association with a vendor or customer.	Dubious record keeping.
A lifestyle above apparent financial means; the provision of gifts to other staff members.	High overheads.
Failure to keep records and provide receipts.	Bank reconciliations not up to date.
Chronic shortage of cash or seeking salary advances.	Inadequate segregation of duties.
Past legal problems (including minor previous thefts).	Reconciliations not performed on a regular basis.
Addiction problems (substance or gambling).	Small cash discrepancies over a period of time.

AC189 COMPLIANCE AUDIT RETURN 2025

AGENDA REFERENCE:	**D-26-081973**
AUTHOR:	**L Maldea, Manager Corporate Compliance**
EXECUTIVE:	**P Radalj, Director Corporate Services**
DATE OF REPORT:	**13 July 2026**
FILE REFERENCE:	**GO/11/0020**
ATTACHMENTS:	**Yes (x1)** **A. Compliance Audit Return 2025**

EXECUTIVE SUMMARY:
The purpose of this report is to seek Audit, Risk and Improvement Committee review of the 2025 Compliance Audit Return (CAR) for the purposes of providing a report on the review to Council.

EXECUTIVE RECOMMENDATION:
That the Audit, Risk and Improvement Committee by Simple Majority pursuant to Section 7.1CA of the *Local Government Act 1995* and *Regulation 14 of the Local Government (Audit) Regulations 1996* RESOLVES to:

1. REVIEW the results of the Compliance Audit Return 2025.
2. REPORT to Council the results of the Audit, Risk and Improvement Committee's reviw of the Compliance Audit Return 2025, at the Ordinary Meeting of Council on 25 August 2026.

PROPONENT:
The proponent is the City of Greater Geraldton (the City).

BACKGROUND:
In accordance with section 7.13(1) of the *Local Government Act 1995* and Regulation 14 of the *Local Government (Audit) Regulations 1996*, the City is required to carry out a compliance audit for the period 1 January 2025 to 31 December 2025 and prepare a Compliance Audit Return (CAR) in a form approved by the Inspector for Local Government.

The 2025 Compliance Audit Return (CAR) is provided to the City by the Department of Local Government, Industry Regulation and Safety (LGIRS) to undertake a self-assessment on those areas of compliance considered high risk.

CONNECTED, LIVEABLE, THRIVING, LEADING – ISSUES AND OPPORTUNITIES:

Connected:
There are no adverse impacts.

Liveable:
There are no adverse impacts.

Thriving:
There are no adverse impacts.

Leading:
Review of the CAR and reporting to Council by the Audit, Risk and Improvement Committee is a regulatory requirement under the provisions of the *Local Government (Audit) Regulations 1996*.

Disclosure of Interest:
No Officer involved in the preparation of this report has a declarable interest in this matter.

RELEVANT PRECEDENTS:
The Audit Committee reviewed the 2024 Compliance Audit Return for the City of Greater Geraldton on 18 February 2025 AC154 and submitted a report to the Council on 25 February 2025 Item No. CS189.

COMMUNITY/COUNCIL MEMBER CONSULTATION:
There has been no community/Council Member consultation.

LEGISLATIVE/POLICY IMPLICATIONS:
The Office of the Local Government Inspectorate commenced operations on 1 January 2026 following reforms to the *Local Government Act 1995*. Amendments to the Local Government (Audit) Regulations 1996 also commenced in January permitting the Local Government Inspector to limit prescribed CAR requirements. Accordingly, the 2025 CAR does not include all statutory requirements as set out in Audit Regulation 13.

14. Compliance audits

> *(1) A local government must carry out an audit (a compliance audit) of the local government's compliance with the statutory requirements prescribed by regulation 13 for the period beginning on 1 January and ending on 31 December in each year.*
>
> *(1A) Subregulation (1) is subject to regulation 15A.*
>
> *(2) After a local government has carried out a compliance audit, the CEO must —*
>
> *(a) prepare a compliance audit return in a form approved by the Inspector; and*
> *(b) give a copy of the compliance audit return to the local government's audit, risk and improvement committee.*
>
> (3) The audit, risk and improvement committee must —
>
> *(a) review the compliance audit return; and*
> *(b) report to the council the results of that review.*
>
> *(4) When reporting to the council, the audit, risk and improvement committee must make any recommendations that the committee considers appropriate in relation to the compliance audit return.*

(5) The council must consider the compliance audit return and the results of the audit, risk and improvement committee's review (including any recommendations) at a meeting of the council.

(6) The council must —

(a) determine if any matters raised by the audit, risk and improvement committee require action to be taken by the local government; and
(b) either —
(i) adopt the compliance audit return; or
(ii) adopt the compliance audit return subject to amendments proposed by the council.

[Regulation 14 inserted: SL 2025/211 r. 14; amended: SL 2025/208 r. 30.]

FINANCIAL AND RESOURCE IMPLICATIONS:
There are no financial or resource implications.

INTEGRATED PLANNING LINKS:

Strategic Theme: Leading	**A progressive City where informed decisions, strong advocacy and an enabling culture drives sustainable regional growth.**
Goal 6	Ensure high quality governance activities enabling transparency and accountability.

REGIONAL OUTCOMES:
There are no impacts to regional outcomes.

RISK MANAGEMENT:
Local Governments are legislatively required to carry out a compliance audit return for the period 1 January to 31 December in each year and prepare a return in the form approved by the Minister. The return must be reviewed by the Audit Committee, and the Committee are required to report to the Council the results of that review. Council is required to adopt the CAR and submit to the Department CEO by 30 September 2026. Usually, the deadline for submission is 31 March, however, the deadline was extended on account of the Local Government Inspector commencing operations. Compliance with these provisions addresses the risk associated with regulatory obligation.

ALTERNATIVE OPTIONS CONSIDERED BY CITY OFFICERS:
No alternative options were considered by City Officers.

W

Compliance Audit Return 2025 Questions

Regulation 14 of the Local Government (Audit) Regulations 1996 requires local governments to carry out a compliance audit return for the period of 1 January to 31 December of each year.

Reference	Question	Responsible Person	Response Y/ N / N/A	Comments
Local Government Act 1995				
s. 2.29	Has every person elected or appointed to a mayor, president, deputy, or councillor role made the required declaration in the prescribed form before a prescribed person, prior to acting in the office?	Coordinator Governance	YES	
s. 3.16	Has the local government reviewed local laws which have not been reviewed in the previous 8 years, to ensure compliance with Schedule 9.3, Clause 65?	Coordinator Governance	YES	
s. 3.57	Subject to Local Government (Functions and General) Regulations 1996, regulation 11(2), did the local government invite tenders for all contracts for the supply of goods or services where the consideration under the contract was, or was expected to be, worth more than the consideration stated in	Coordinator Procurement	YES	

	regulation 11(1) of the Regulations?			
s. 3.58(3)	Where the local government disposed of property other than by public auction or tender, did it dispose of the property in accordance with section 3.58(3) of the *Local Government Act 1995* (unless section 3.58(5) applies)?	Coordinator Land and Leasing Supervisor Airport Commercial and Compliance	Yes YES (Airport)	
s. 3.58(4)	Where the local government disposed of property under section 3.58(3) of the *Local Government Act 1995*, did it provide details, as prescribed by section 3.58(4) of the Act, in the required local public notice for each disposal of property?	Coordinator Land and Leasing Supervisor Airport Commercial and Compliance	Yes YES (Airport)	
s. 3.59(2)(a)	Has the local government prepared a business plan for each major trading undertaking that was not exempt in 2025?	Coordinator Land and Leasing	Not applicable – Land & Leasing Program	
s. 3.59(2)(b)	Has the local government prepared a business plan for each major land transaction that was not exempt in 2025?	Coordinator Land and Leasing	Not applicable – Land & Leasing Program	
s. 3.59(2)(c)	Has the local government prepared a business plan before entering into each land transaction that was preparatory to entry into a major land transaction in 2025?	Coordinator Land and Leasing	Not applicable – Land & Leasing Program	

Reference	Question	Responsible Person	Response Y/ N / N/A	Comments
s. 3.59(4)	Has the local government complied with public notice and publishing requirements for each proposal to commence a major trading undertaking or enter into a major land transaction or a land transaction that is preparatory to a major land transaction for 2025?	Coordinator Land and Leasing	Not applicable – Land & Leasing Program	
s. 3.59(5)	During 2025, did the council resolve to proceed with each major land transaction or trading undertaking by absolute majority?	Coordinator Land and Leasing	Not applicable – Land & Leasing Program	
s. 5.16 (1)	Were all delegations to committees resolved by absolute majority?	Coordinator Governance	YES	
s. 5.16 (2)	Were all delegations to committees in writing?	Coordinator Governance	YES	
s. 5.17	Were all delegations to committees within the limits specified in section 5.17 of the *Local Government Act 1995*?	Coordinator Governance	YES	
s. 5.18	Were all delegations to committees recorded in a register of delegations?	Coordinator Governance	YES	
s. 5.36(4) C s. 5.37(3)	Were all CEO and/or senior employee vacancies advertised in accordance with Local Government (Administration) Regulations 1996, regulation 18A?	Coordinator Human Resources	N/A	No CEO recruitment undertaken during this period.
s. 5.37(2)	Did the CEO inform council of each proposal to employ or dismiss senior employee? Where council rejected a CEO's recommendation to employ or	CEO	N/A	No senior employees have been appointed.

	dismiss a senior employee, did it inform the CEO of the reasons for doing so?			
s. 5.39B	Has the local government adopted and maintained model standards that incorporate the prescribed model standards within required timeframes (including amendments), ensured adoption by absolute majority, published an up-to-date version on its official website, and avoided including any inconsistent additional provisions?	Coordinator Human Resources	N/A	Model standards were adopted in 2021 and have maintained and published on the City website since then. No changes have been made to the standards since adoption.
s. 5.42	Were all delegations to the CEO resolved by an absolute majority? Were all delegations to the CEO in writing?	Coordinator Governance	YES YES	
s. 5.43	Did the powers and duties delegated to the CEO exclude those listed in section 5.43 of the *Local Government Act 1995*?	Coordinator Governance	YES	
s. 5.44(2)	Were all employees delegated authority by the CEO under Section 5.44(1), issued with a written instrument of delegation?	Coordinator Governance	YES	

Reference	Question	Responsible Person	Response Y/ N / N/A	Comments
s. 5.45(1)(b)	Were all decisions by the Council to amend or revoke a delegation made by absolute majority?	Coordinator Governance	YES	
s. 5.46	Has the CEO kept a register of all delegations made under Division 4 of the *Local Government Act 1995* to the CEO and to employees? Were all delegations made under Division 4 reviewed by the delegator at least once during the 2024/2025 financial year? Did all persons exercising a delegated power or duty under the Act keep, on all occasions, a written record in accordance with Local Government (Administration) Regulations 1996, regulation 19?	Coordinator Governance	YES YES YES	
s. 5.50	If the local government paid a finishing employee an amount in addition to their entitlement, did the local government follow a policy it had adopted and published on the website? outlining the circumstances in relation to payments made to terminated employees? If the local government made a payment to a finishing employee that is more than the amount set out in the policy, was local public notice given?	Coordinator Human Resources	Yes N/A	Council Policy 4.14 - Payments to Employees in Addition to Contract or Award - Version 5.

s. 5.51A	Has the CEO prepared and implemented a code of conduct to be observed by employees of the local government? If yes, has the CEO published an up-to-date version of the code of conduct for employees on the local government's website?	Coordinator Human Resources	Yes Yes	The Employee Code of Conduct is published on the City Website Code of Conduct » City of Greater Geraldton
s. 5.67	Where a council member disclosed an interest in a matter and did not have participation approval under sections 5.68 or 5.69 of the *Local Government Act 1995*, did the council member ensure that they did not remain present to participate in discussion or decision making relating to the matter?	CEO	YES	
s. 5.68(2)	Were all decisions regarding participation approval in relation to Section 5.68(2), including the extent of participation allowed and, where relevant, the information required by the Local Government (Administration) Regulations 1996 regulation 21A, recorded in the minutes of the relevant council or committee meeting?	CEO	N/A	No requests were made, therefore Council Members were not required to allow a member to be present during any discussions or decision making. There were no gifts received to record.
s. 5.69(5)	Were all decisions regarding participation approval in relation to Section 5.69(5), including the extent of participation allowed recorded in the minutes of the relevant council or committee meeting?	CEO	N/A	No requests were made to the Minister to allow members, disclosing an interest, to participate in a Council or committee meeting.

Reference	Question	Responsible Person	Response Y/ N / N/A	Comments
s. 5.70	Where an employee had an interest in any matter in respect of which the employee provided advice or a report directly to council or a committee, did that person disclose the nature and extent of that interest when giving the advice or report?	CEO	N/A	There were no employee interests in respect of advice or a report directly to a council or committee.
s. 5.71B(5) and (7)	Where council applied to the Minister to allow the CEO to provide advice or a report to which a disclosure under section 5.71A(1) of the *Local Government Act 1995* relates, did the application include details of the nature of the interest disclosed and any other information required by the Minister for the purposes of the application? Was any decision made by the Minister under section 5.71B(6) of the *Local Government Act 1995*, recorded in the minutes of the council meeting at which the decision was considered?	CEO	N/A	No applications were made to the Minister
s. 5.73	Were disclosures under sections 5.65, 5.70 or 5.71A(3) of the *Local Government Act 1995* recorded in the minutes of the meeting at which the disclosures were made?	CEO	YES	
s. 5.75	Was a primary return in the prescribed form lodged by all relevant persons within three months of their start day?	Coordinator Governance	NO	As part of the 2026-27 Annual Review of Delegations Register process, an administrative error was discovered in the 2025-26 Delegations Register. Rangers were erroneously and unintentionally added to

				the 2025-26 Delegations Register with respect to Delegated Authority to determine disposal of sick or injured animals. There was no intention to include Rangers in the Register or provide them with this delegated authority as internal processes and controls are sufficient for the delegated authority to sit with the Manager and Coordinator. Upon enquiries with the relevant team members, it has been determined that this delegated authority has never been used by the Rangers as there was no intention of having it included. This delegation has been removed from Delegations Register 2026-27.
s. 5.76	Was an annual return in the prescribed form lodged by all relevant persons by 31 August 2025?	Coordinator Governance	NO	As per above answer s.5.75
s. 5.77	On receipt of a primary or annual return, did the CEO, or the Mayor/President, as the case may be, give written acknowledgment of having received the return?	Coordinator Governance	YES	

s. 5.88	Did the CEO keep a register of financial interests which contained the returns lodged under sections 5.75 and 5.76 of the Local Government Act 1995? Did the CEO keep a register of financial interests which contained a record of disclosures made under sections 5.65, 5.70, 5.71 and 5.71A of the Local Government Act 1995, in the form prescribed in the Local Government (Administration) Regulations 1996, regulation 28? After a person ceased to be a person required to lodge a return under sections 5.75 and 5.76 of the *Local Government Act 1995*, did the CEO remove from the register all returns relating to that person? Have all returns removed from the register in accordance with section 5.88(3) of the *Local Government Act 1995* been kept for a period of at least five years after the person who lodged the return(s) ceased to be a person required to lodge a return?	CEO/Coordinator Governance	YES YES YES YES	

Reference	Question	Responsible Person	Response Y/ N / N/A	Comments
s. 5.89A	Did the CEO keep a register of gifts which contained a record of disclosures made under sections 5.87A and 5.87B of the *Local Government Act 1995*, in the form prescribed in the Local Government (Administration) Regulations 1996, regulation 28A? Did the CEO publish an up-to-date version of the gift register on the local government's website?	Coordinator Governance	YES YES	
s. 5.90A	Did the local government prepare, adopt by absolute majority and publish an up-to-date version on the local government's website, a policy dealing with the attendance of council members and the CEO at events?	Coordinator Governance	YES	
s. 5.94	Does the local government have information available for members of the public to inspect, free of charge as prescribed under section 5.94 and Admin Reg 29, except where restricted under this section?	Coordinator Governance	YES	
s. 5.96	Where a person is entitled to inspect information under this Division, can the local government confirm that copies are available and that the price at which it sells copies does not exceed the cost of providing them, (unless prescribed otherwise)?	Coordinator Governance	YES	
s. 5.96A	Did the CEO publish information on the local government's website in accordance with sections 5.96A(1), (2), (3), and (4) of the *Local Government*	Coordinator Governance	YES	

	Act 1995?			
s. 5.104	Did the local government prepare and adopt, by absolute majority, a code of conduct to be observed by council members, committee members and candidates that incorporates the model code of conduct? Did the local government adopt additional requirements in addition to the model code of conduct? If yes, does it comply with section 5.104(3) and (4) of the Local Government Act 1995? Has the CEO published an up-to-date version of the code of conduct for council members, committee members and candidates on the local government's website?	Coordinator Governance	N/A N/A YES	
s. 5.128	Did the local government prepare and adopt (by absolute majority) a policy in relation to the continuing professional development of council members?	CEO	YES	

Reference	Question	Responsible Person	Response Y/ N / N/A	Comments
s. 7.12A(3), (4) and (5)	Where the local government determined that matters raised in the auditor's report prepared under section 7.9(1) of the Local Government Act 1995 required action to be taken, did the local government ensure that appropriate action was undertaken in respect of those matters? Where matters identified as significant were reported in the auditor's report, did the local government prepare a report that stated what action the local government had taken or intended to take with respect to each of those matters? Was a copy of the report given to the Minister within three months of the audit report being received by the local government? Within 14 days after the local government gave a report to the Minister under section 7.12A(4)(b) of the *Local Government Act 1995*, did the CEO publish a copy of the report on the local government's official website?	CFO	YES N/A N/A	A detailed action list of all audit matters is maintained and a progress report provided to each meeting of the ARIC. No significant matters reported in the auditor's report.
Local Government (Administration) Regulations 1996		**Response Y/ N / N/A**	**Comments**	
Reg 18F	Was the remuneration and other benefits paid to a CEO on appointment the same remuneration and benefits advertised for the position under section 5.36(4) of the	Coordinator Human Resources	N/A	N/A

	Local Government Act 1995?			
Reg 19AB	Does the code of conduct contain the requirement that a local government employee (not including the CEO) must not accept a prohibited gift from an associated person?	Coordinator Human Resources	Yes	
Reg 19AC	Does the local government's code of conduct include requirements for the recording, storing, disclosure, and use of information relating to gifts accepted by local government employees (excluding the CEO) from associated persons, in accordance with regulatory requirements?	Coordinator Human Resources	Yes	
Reg 19AE	Does the local government's code of conduct include requirements addressing employee behaviour in the performance of duties, interactions with others, use and disclosure of information, use of local government resources and finances, the keeping of records, and the reporting and management of suspected breaches and misconduct, in accordance with regulatory requirements?	Coordinator Human Resources	Yes	
Reg 19B	Did the local government include in its annual report all information required under section 5.53(2)(g) and (i) and regulation 3A(2), including number of employee's in salary bands over $130,000, remuneration and allowances paid, ordered payments, CEO remuneration, council member meeting attendance, available demographic information about council	Coordinator Human Resources	YES	

	members, and details of any modifications to the strategic community plan or significant modifications to the corporate business plan?			

Reference	Question	Responsible Person	Response Y/ N / N/A	Comments
Reg 19C	Has the local government adopted by absolute majority a strategic community plan? If yes, provide the date of the most recent review	CFO	YES	Council adopted by absolute majority the Strategic Community Plan 2025-2035 at the OCM on 24 June 2025 (CS222)
Reg 19DA	Has the local government reviewed its corporate business plan in accordance with Admin Regulation 19DA(4) ? If yes, provide date of review. Does the corporate business plan comply with the requirements of Local Government (Administration) Regulations 1996 19DA(2) & (3)?	CFO	YES YES	The Corporate Business Plan was reviewed in conjunction with the Strategic Community Plan. The Corporate Business Plan 2025-2029 was adopted at the OCM on 24 June 2025 (CS222).
Reg 22	Asked as part of question s5.75			
Reg 23	Asked as part of question s5.76			
Reg 28	Asked as part of question s5.88(1)			
Reg 28A	Asked as part of question s5.89A(1)			
Reg 29	Asked as part of question s5.94			
Reg 29C	Does the local government publish all prescribed information on its official website— including up-to-date policies, required details of council member and employee returns, council member fees and allowances, and relevant public notices—within the specified	Coordinator Governance	YES	

	timeframes and in accordance with legislative requirements?			
Reg 35	Has every local government council member completed and passed the Council Member Essentials course, consisting of the five required modules and delivered by an approved provider, within 12 months of being elected?	CEO	NO	New Council Members were progressing with their Council Members Essentials training after the October 2025 Elections. Their completion due date is 17 October 2026.
Reg 36	Does the local government appropriately identify and document council members who are exempt from the training requirements under section 5.126(1), including verifying that the member: - has completed an approved course within the specified 5-year period prior to election, or - completed the LGASS00002 Elected Member Skill Set before 1 July 2019 within the relevant timeframe, or - qualifies for the transitional exemption applicable to council members in office at the commencement of the 2019 regulatory amendments?	CEO	N/A	There were no exemptions post elections.

Reference	Question	Responsible Person	Response Y/ N / N/A	Comments
Local Government (Audit) Regulations 1996				
Reg 10	Was the auditor's report for the financial year ending 30 June 2025 received by the local government within 30 days of completion of the audit?	CFO	YES	
Reg 17	Did the CEO review the appropriateness and effectiveness of the local government's systems and procedures in relation to risk management, internal control and legislative compliance in accordance with Local Government (Audit) Regulations 1996 regulation 17 within the three financial years prior to 31 December 2025? If yes, provide date of council's resolution to accept the report.	CFO	YES	Review was completed in April 2024. Provided to the Audit Committee on 23April 2024 (AC149). Council received the review at the OCM on 28 May 2024 (CS125)
Local Government (Constitution) Regulations 1998		**Response Y/ N / N/A**	**Comments**	
Reg 11FA	Did the CEO provide the Minister a report as to the result of the election within 14 days of the declaration and in the form of Form 20 of the Local Government (Elections) Regulations 1997, modified as necessary?	Coordinator Governance	YES	

Reg 13	Were all required oaths, affirmations and declarations under section 2.42 (in relation to Commissioners) made in the correct form (Form 8), before the appropriate authorised person?	Coordinator Governance	YES	
Local Government (Elections) Regulations 1997		**Response Y/ N / N/A**	**Comments**	
Reg 30G	Did the CEO establish and maintain an electoral gift register and ensure that all disclosure of gifts forms completed by candidates and donors and received by the CEO were placed on the electoral gift register at the time of receipt by the CEO and in a manner that clearly identifies and distinguishes the forms relating to each candidate in accordance with regulations 30G(1) and 30G(2) of the Local Government (Elections) Regulations 1997? Did the CEO remove any disclosure of gifts forms relating to an unsuccessful candidate, or a successful candidate that completed their term of office, from the electoral gift register, and retain those forms separately for a period of at least two years in accordance with regulation 30G(4) of the Local Government (Elections) Regulations 1997? Did the CEO publish an up-to-date version of the electoral gift register on the local	Coordinator Governance	YES YES YES	

	government's official website in accordance with regulation 30G(5) of the Local Government (Elections) Regulations 1997?			

Reference	Question	Responsible Person	Response Y/ N / N/A	Comments
Local Government (Financial Management) Regulations 1996				
Reg 5	Has the CEO ensured efficient systems and procedures are established under provisions set out in Financial Management Regulations 5(1)(a) to (g)?	CFO	YES	Yes – confirmed by an external review completed in April 2024.
Reg 6	Has the local government ensured that any employee delegated responsibility for day-to-day accounting or financial management operations is not also delegated the responsibility for conducting internal audits, reviewing their own duties, or for managing, directing or supervising someone who carries out these functions?	CFO	YES	
Reg 7	Did the local government ensure it has regard to the needs of the inhabitants of the district as a whole and not keep separate ward accounts or determine expenditure on the basis of revenue from a ward?	CFO	YES	CGG does not have wards.
Reg 8	Does the local government maintain separate accounts with a bank or other financial institution for money to be held in the municipal fund, trust fund and for reserve account purposes?	CFO	YES	
Reg 9	Did the local government keep separate financial records for each trading undertaking and each major	CFO	YES	

	land transaction?			
Reg 11	Has the local government developed procedures for the authorisation of, and the payment of, accounts in accordance with Local Government (Financial Management) Regulations 11(1), (2) and (3)?	CFO	YES	
Reg 12	Were payments made from the municipal fund or trust fund made by the CEO under a delegated authority or authorised, in accordance with regulation 13(2), in advance by a council resolution?	CFO	YES	CEO delegation
Reg 13	Can the local government confirm that, where the CEO has been delegated authority to make payments from the municipal or trust fund, the CEO prepared accurate monthly lists that are presented at the next ordinary council meeting and recorded in the minutes that: - include the payee's name, payment amount, payment date, and sufficient information to identify each transaction where payments have already been made; or - include the payee's name, payment amount, sufficient information to identify each transaction, and the date of the council meeting (to which the list will be presented) for accounts requiring council approval?	CFO	YES	

Reference	Question	Responsible Person	Response Y/ N / N/A	Comments
Reg 13A	Did the local government prepare a list each month of all payments made using employee-authorised credit, debit or other purchasing cards, and include the payee's name, the amount of the payment, the date of the payment, sufficient information to identify the payment, and present the list at the next ordinary council meeting (and record in the minutes)?	CFO	YES	
Reg 19	Has the local government established and documented internal control procedures to enable identification of the nature and location of all investments and any related transactions?	CFO	YES	
Reg 19C	Has the local government ensured that all investments made under section 6.14(1) comply with statutory restrictions set out in Financial Management Reg. 19C?	CFO	YES	
Local Government (Functions and General) Regulations 1996				
Reg 7	Asked as part of question s3.59(2)			
Reg 9	Asked as part of question s3.59(2)			
Reg 10	Asked as part of question s3.59(2)			

Reg 11A	Did the local government comply with its current purchasing policy, adopted under the Local Government (Functions and General) Regulations 1996, regulations 11A(1) and (3) in relation to the supply of goods or services where the consideration under the contract was, or was expected to be, $250,000 or less or worth $250,000 or less?	Coordinator Procurement	YES	
Reg 11	Asked as part of question s3.57			
Reg 12	Did the local government consider the implications of Local Government (Functions and General) Regulations 1996, Regulation 12 when deciding to enter into multiple contracts rather than a single contract?	Coordinator Procurement	YES	
Reg 14(1), (3) and (5)	If the local government sought to vary the information supplied to tenderers, was every reasonable step taken to give each person who sought copies of the tender documents, or each acceptable tenderer notice of the variation?	Coordinator Procurement	YES	
Reg 15	Did the local government's procedure for receiving and opening tenders comply with the requirements of Local Government (Functions and General) Regulations 1996, Regulation 15 and 16?	Coordinator Procurement	YES	

Reference	Question	Responsible Person	Response Y/ N / N/A	Comments
Reg 16	Asked as part of question Reg 15			
Reg 17	Did the information recorded in the local government's tender register comply with the requirements of the Local Government (Functions and General) Regulations 1996, Regulation 17 and did the CEO make the tenders register available for public inspection and publish it on the local government's official website?	Coordinator Procurement	YES	
Reg 18(1) and (4)	Did the local government reject any tenders that were not submitted at the place, and within the time, specified in the invitation to tender? Were all tenders that were not rejected assessed by the local government via a written evaluation of the extent to which each tender satisfies the criteria for deciding which tender to accept?	Coordinator Procurement	NO	
Reg 19	Did the CEO give each tenderer written notice containing particulars of the successful tender or advising that no tender was accepted?	Coordinator Procurement	YES	
Reg 21	Does the local government's advertising and expression of interest processes for limiting who can tender comply with the requirements of the Local	Coordinator Procurement	YES	

	Government (Functions and General) Regulations 1996, Regulations 21 and 22?			
Reg 22	Asked as part of question Reg 21			
Reg 23	Did the local government reject any expressions of interest that were not submitted at the place, and within the time, specified in the notice or that failed to comply with any other requirement specified in the notice? Were all expressions of interest that were not rejected under the Local Government (Functions and General) Regulations 1996, Regulation 23(1) C (2) assessed by the local government? Did the CEO list each person as an acceptable tenderer?	Coordinator Procurement	NO	
Reg 24	Did the CEO give each person who submitted an expression of interest a notice in writing of the outcome in accordance with Local Government (Functions and General) Regulations 1996, Regulation 24?	Coordinator Procurement	YES	

Reference	Question	Responsible Person	Response Y/ N / N/A	Comments
Reg 24AD(2), (4) and (6)	Did the local government invite applicants for a panel of pre-qualified suppliers via Statewide public notice in accordance with Local Government (Functions C General) Regulations 1996 regulations 24AD(4) and 24AE? If the local government sought to vary the information supplied to the panel, was every reasonable step taken to give each person who sought detailed information about the proposed panel or each person who submitted an application notice of the variation?	Coordinator Procurement	NO N/A	LG did not invite applicants for a panel of pre-qualified suppliers in 2025.
Reg 24AE	Asked as part of question Reg 24AD(2), (4) and (6)			
Reg 24AF	Asked as part of question Reg 24AD(2), (4) and (6)			
Reg 24AG	Did the information recorded in the local government's tender register about panels of pre-qualified suppliers comply with the requirements of Local Government (Functions and General) Regulations 1996, Regulation 24AG?	Coordinator Procurement	YES	
Reg 24AH(1) and (3)	Did the local government reject any applications to join a panel of prequalified suppliers that were not submitted at the place, and within the time, specified in the invitation for applications?	Coordinator Procurement	N/A	LG did not invite applicants for a panel of pre-qualified suppliers in 2025.

	Were all applications that were not rejected assessed by the local government via a written evaluation of the extent to which each application satisfies the criteria for deciding which application to accept?			
Reg 24AI	Did the CEO send each applicant written notice advising them of the outcome of their application?	Coordinator Procurement	YES	
Reg 24E	Where the local government gave regional price preference, did the local government comply with the requirements of Local Government (Functions and General) Regulations 1996, Regulation 24E and 24F?	Coordinator Procurement	YES	
Reg 24F	Asked as part of question Reg 24			

AC190 RISK MANAGEMENT UPDATE

AGENDA REFERENCE:	**D-26-082068**
AUTHOR:	**L Maldea, Manager Corporate Compliance**
EXECUTIVE:	**P Radalj, Director Corporate Services**
DATE OF REPORT:	**8 July 2026**
FILE REFERENCE:	**GO/11/0020-003**
ATTACHMENTS:	**Yes(x2) x2 Confidential** **A. Confidential – Strategic Risk Register** **A. Confidential – Major Projects Risk Register**

EXECUTIVE SUMMARY:
The purpose of this report is to provide an update to the Audit, Risk and Improvement Committee on the City's risk management review.

EXECUTIVE RECOMMENDATION:
That the Audit, Risk and Improvement Committee by Simple Majority pursuant to Section 7.1CA of the *Local Government Act 1995* RESOLVES to:

1. NOTE the status of the risk management review currently being undertaken;
2. ACKNOWLEDGE the updates to the City's Strategic Risk Register and Major Projects Risk Register and request an update at the next Audit, Risk and Improvement Committee meeting.

PROPONENT:
The proponent is the City of Greater Geraldton (the City).

BACKGROUND:
A full review of the City's Risk Management Framework and related documentation was undertaken and endorsed by ARIC in February and by Council at the March Ordinary Council Meeting.

Risk management activities continue to progress across the organisation in accordance with the City's Risk Management Framework and Council Policy 4.7 Risk Management. Departmental risks remain an ongoing focus, with responsible officers continuing to review, update and progress risk actions to support active monitoring, treatment and reporting of key operational exposures.

The Strategic Risk and Major Projects Risk Registers have undergone a quarterly review. These registers are important tools for maintaining visibility of risks that may impact delivery of the City's strategic objectives, major initiatives and project outcomes. Officers have continued to refine risk descriptions, review controls and treatment actions, and strengthen the alignment between identified risks, accountable areas and reporting requirements.

Changes to the Strategic Risk Register and Major Projects Risk Register can be found outlined at the end of each risk in the attached registers.

The July Strategic and Major Projects Risk Registers show that the registers have continued to mature since the February ARIC reporting point, with changes now being documented against individual risks. The July registers include refined risk descriptions, expanded or updated key drivers, treatment actions and consequences, and clearer references to accountable areas. A notable change is the movement of one Major Project Risk from the Major Projects Risk Register into the Strategic Risk Register.

The Major Projects Risk Register also reflects a reassessment of several project risk profiles at an organisational level, with several inherent and residual ratings reduced, while other Major Project related risks remain high or have been further developed. Two further Major Projects have been identified and listed in the Major Projects Risk Register. The Strategic Risk Register largely retains existing ratings, with updates focused on strengthening action commentary, documenting recent progress, and improving alignment with current organisational priorities and reporting expectations.

The Strategic Risk Register and Major Projects Risk Register are intended to be reviewed each quarter and as necessary to provide an update to ARIC on the City's risk management.

CONNECTED, LIVEABLE, THRIVING, LEADING –
ISSUES AND OPPORTUNITIES:

Connected:
Risk management supports the identification of barriers that may impact community safety, inclusion, engagement and social cohesion, enabling the City to consider appropriate controls and actions to support achievement of the City's strategic objectives.

Liveable:
Risk management assists in identifying barriers to delivering and maintaining safe, accessible and sustainable community infrastructure, services and natural environment outcomes, supporting informed planning and action.

Thriving:

Risk management helps identify barriers to sustainable growth, economic development, investment attraction and service delivery, enabling risks to be considered and managed.

Leading:
Review of the City's Strategic and Major Projects Risk registers pursuant to the Risk Management Framework ensures that ARIC remains current, compliant and effective in the management of City risk activities.

Disclosure of Interest:
No Officer involved in the preparation of this report has a declarable interest in this matter.

RELEVANT PRECEDENTS:
AC181 – Risk Management Update – 24 February 2026

COMMUNITY/COUNCIL MEMBER CONSULTATION:
There has been no community/Council Member consultation.

LEGISLATIVE/POLICY IMPLICATIONS:
This item has compliance and policy implications as follows:

- *Local Government (Audit) Regulations 1996*, Regulation 17
- City of Greater Geraldton Risk Management Framework
- Council Policy 4.7 Risk Management
- Council Policy 4.24 Risk Appetite and Tolerance
- Council Policy 4.25 Business Continuity Management

FINANCIAL AND RESOURCE IMPLICATIONS:
The review has been managed by the Governance team with whole of organisation input and resourcing. Financial sustainability and viability have been identified as the key link and common denominator between all risks. If the City does not have the financial resources in place to meet the identified actions, the residual risk will likely increase leading to a knock-on effect on the City's achievement of objectives.

INTEGRATED PLANNING LINKS:

Strategic Theme: Connected	**An engaged and diverse community where everyone feels included and safe.**
Goal 1	Provide safe and inviting public spaces for people to enjoy.
Strategic Theme: Liveable	**A protected and enhanced natural environment with facilities and services to support community health and wellbeing.**
Goal 3	Manage and protect the City's natural environment, and identify strategies to mitigate climate change.
Strategic Theme: Thriving	**An economically diverse and prosperous City, driving sustainable growth while preserving our local spirit.**
Goal 3	Plan for the sustainable growth of the City, balancing the needs of current and future populations.
Strategic Theme: Leading	**A progressive City where informed decisions, strong advocacy and an enabling culture drives sustainable regional growth.**
Goal 3	Financial sustainability, actively seeking and leveraging external funding to deliver for the community.
Goal 6	Ensure high quality governance activities enabling transparency and accountability.

REGIONAL OUTCOMES:
There are no impacts to regional outcomes.

RISK MANAGEMENT:
The continued development of Departmental, Strategic and Major Project Risk Registers supports a more consistent and integrated approach to risk management across the City. This work contributes to improved governance, transparency and accountability by ensuring risks are identified, assessed and managed as part of business-as-usual activities and decision-making processes.

ALTERNATIVE OPTIONS CONSIDERED BY CITY OFFICERS:
No alternative options were considered by City Officers.

AC191 PROGRESS REPORT ON AUDIT RECOMMENDATIONS – JULY 2026

AGENDA REFERENCE:	**D-26-082007**
AUTHOR:	**N Jane, Chief Financial Officer**
EXECUTIVE:	**P Radalj, Director Corporate Services**
DATE OF REPORT:	**5 July 2026**
FILE REFERENCE:	**GO/11/0020-003**
ATTACHMENTS:	**Yes x1 Confidential Progress Report on Audit Recommendations – July 2026**

EXECUTIVE SUMMARY:
The purpose of this report is to provide the Audit, Risk and Improvement Committee with an update on the progress of actions taken by management to implement audit recommendations.

EXECUTIVE RECOMMENDATION:
That the Audit, Risk and Improvement Committee by Simple Majority pursuant to Section 7.1CA of the *Local Government Act 1995* RESOLVES to:

1. RECEIVE the Progress Report on Audit Recommendations for July 2026.

PROPONENT:
The proponent is the City of Greater Geraldton (the City).

BACKGROUND:
When receiving audit reports, the Audit, Risk and Improvement Committee requested progress updates on implementation of the proposed management actions. The progress report provided, addresses audits completed up to June 2026. Items previously reported as completed have been removed and updates included on all remaining actions.

The report provides updates on actions from:
- 2024 Financial Management Systems Review
- 2024 Audit Regulation 17 Review
- 2020 Audit Regulation 17 Review
- 2024 Compliance Obligations Review
- 2024 Fraud and Corruption Control Plan Review
- 2024-25 IT General Controls Audit
- 2025 Asset Management and Disposal of Assets

CONNECTED, LIVEABLE, THRIVING, LEADING – ISSUES AND OPPORTUNITIES:

Connected:
There are no adverse impacts.

Liveable:
There are no adverse impacts.

Thriving:
There are no adverse impacts.

Leading:

Monitoring the actions resulting from audits assists the Committee to fulfill its governance and oversight responsibilities. The report enables the Committee to monitor the timeliness of agreed actions and understand the reasons for any delay

Disclosure of Interest:
No Officer involved in the preparation of this report has a declarable interest in this matter.

RELEVANT PRECEDENTS:
A progress report on audit recommendations is provided to the Committee regularly. The most recent was AC179 – Progress Report on Audit Recommendations – February 2026, received on 24 February 2026.

COMMUNITY/COUNCIL MEMBER CONSULTATION:
There has been no community/Council Member consultation.

LEGISLATIVE/POLICY IMPLICATIONS:
Local Government (Audit) Regulations 1996, regulation 16 outlines the functions of the audit risk and improvement committee including its role to receive and review reports on and recommend to the council actions to be taken in relation to audits, compliance audits, reviews under regulation 17 systems and procedures in relation to financial management, legislative compliance and risk management.

FINANCIAL AND RESOURCE IMPLICATIONS:
Where audit recommendations have financial or resource implications, provision is made in subsequent budgets to implement the recommendations.

INTEGRATED PLANNING LINKS:

Strategic Theme: Leading	**A progressive City where informed decisions, strong advocacy and an enabling culture drives sustainable regional growth.**
Goal 5	Provide the community with clear and accessible information about the City's programs, services and decisions.
Goal 6	Ensure high quality governance activities enabling transparency and accountability.

REGIONAL OUTCOMES:
There are no impacts to regional outcomes.

RISK MANAGEMENT:
Part of the Audit, Risk and Improvement Committee function is to mitigate risks to Council. Each audit report, both internal and external, assigns a risk rating to findings. These ratings are based on the audit team's assessment of risks

and concerns with respect to the probability and/or consequences of adverse outcomes if action is not taken. Consideration is given to these potential adverse outcomes in the context of both quantitative impact (for example financial loss) and qualitative impact (for example inefficiency, non-compliance, poor service to the public or loss of public confidence). Management provides responses to each of the findings. Regular reporting on progress by management ensures that risks are appropriately mitigated.

ALTERNATIVE OPTIONS CONSIDERED BY CITY OFFICERS:
No alternative options were considered by City Officers.

AC192 STRATEGIC INTERNAL AUDIT PLAN 2025-2030

AGENDA REFERENCE:	**D-26-082062**
AUTHOR:	**N, Jane, Chief Financial Officer**
EXECUTIVE:	**P Radalj, Director Corporate Services**
DATE OF REPORT:	**6 July 2026**
FILE REFERENCE:	**GO/11/0020-003**
ATTACHMENTS:	**Yes (x1) Confidential** **Confidential – Strategic Internal Audit Plan 2025 - 2030 (revised 2026)**

EXECUTIVE SUMMARY:
The purpose of this report is to request the Committee to endorse the audit actions for 2026-27 as part of the overarching Strategic Internal Audit Plan 2025 – 2030 (SIAP). The key purpose of the plan is to ensure the implementation and establishment of adequate control systems, appropriate risk management and governance procedures to meet the City's objectives and statutory requirements.

EXECUTIVE RECOMMENDATION:
That the Audit, Risk and Improvement Committee by Simple Majority pursuant to Section 7.1CA of the *Local Government Act 1995* RESOLVES to:

1. ENDORSE the auditable areas for 2027 as:
    a. Procurement Compliance
    b. Service Contract Management
    c. Property, Lease and Agreement Management; and
    d. Asset Valuation Processes.
2. REQUEST an update on progress at the next Audit, Risk and Improvement Committee Meeting.

PROPONENT:
The proponent is the City of Greater Geraldton (the City).

BACKGROUND:
Internal audit provides independent, objective assurance over an organisation's risk management, internal control, governance and the processes in place for ensuring effectiveness, efficiency and economy.
The Strategic Internal Audit Plan 2025 - 2030 was endorsed by the Audit Committee on 24 February 2026 (AC178) to ensure the implementation and establishment of adequate control systems, appropriate risk management and governance procedures to meet the City's objectives and statutory requirements.

With the changes to the Local Government Regulations Amendment Regulations (No. 4) 2025 which became effective 1 January 2026 the timing and scope of the Audit Regulation 17 review was updated, resulting in no specific audits being scheduled for the 2026 year.

The plan identifies the following auditable areas for 2027:

1. Annual Review of Strategic Internal Audit Plan
2. Review of prior year recommendations – Internal Audit
3. Review of prior year recommendations – External Audit
4. PRIS Management
5. Risk Management
6. Vehicle and Fleet Management

In line with the SIAP, an annual review of the plan has been undertaken. The following changes to the timing of auditable actions are proposed:

2027

- Service Contract Management – brought forward from 2028 now that the IBIS contracts module has been implemented for a couple of years and aligns with the timing of the public register regulations
- Procurement Compliance – added for 2027 as it aligns well with Contract Management
- Property, Lease and Agreement Management – brought forward from 2028 to align with the timing of the public register regulations
- Asset Valuation Processes – added following request from ARIC

2028

- Audit Regulation 17 Review – no change
- Fraud and Corruption Control Plan – no change
- PRIS Management – reschedule to 2028, as PRIS has only come into effect on 1 July 2026, and mandatory breach notifications don't commence until 1 January 2027
- Project Management
- Tender Management – brought forward from 2029 to align with Project Management

2029

- Risk Management – rescheduled to 2029 to further establish the new risk management framework and policy
- Insurance Protection – added – aligns well with Risk Management
- Security and Emergency Procedures Management – added – aligns well with Risk Management
- Vehicle and Fleet Management – reschedule to 2029 as IBIS has just been implemented and a new Manager will be starting in the next couple of months.

The attached revised Strategic Internal Audit Plan 2025 – 2030 provides detail of the scope for each audit module.

CONNECTED, LIVEABLE, THRIVING, LEADING –
ISSUES AND OPPORTUNITIES:

Connected:

There are no adverse impacts. Undertaking Internal audit activities in line with the plan assists in ensuring we are accountable for our actions to the community.

Liveable:
There are no adverse impacts.

Thriving:
There are no adverse impacts.

Leading:
The ARIC plays a key role in assisting a local government to fulfil its governance and oversight responsibilities in relation to risk management, internal controls, and legislative compliance. The Strategic Internal Audit Plan outlines the required and proposed actions over the period of the plan.

Disclosure of Interest:
No Officer involved in the preparation of this report has a declarable interest in this matter.

RELEVANT PRECEDENTS:
The Audit Risk and Improvement Committee endorsed the Strategic Internal Audit Plan 2025 - 2030 at the meeting on 24 February 2026 (AC178).

COMMUNITY/COUNCIL MEMBER CONSULTATION:
There has been no community/Council Member consultation.

LEGISLATIVE/POLICY IMPLICATIONS:
Local Government (Audit) Regulations 1996, regulation 16:
An audit, risk and improvement committee has the following functions —

- *(a) to receive and review reports on, and recommend to the council actions to be taken in relation to —*
  - *(i) audits under Part 7 of the Act; and*
  - *(ii) compliance audits; and*
  - *(iii) reviews under regulation 17;*
- *(b) to otherwise receive and review reports on the appropriateness and effectiveness of, and recommend to the council improvements to, the local government's systems and procedures in relation to —*
  - *(i) financial management; and*
  - *(ii) legislative compliance; and*
  - *(iii) risk management;*
- *(c) to receive and review reports on, and recommend to the council improvements to, the implementation of any actions that the local government —*
  - *(i) is required to take under section 7.12A(3); and*
  - *(ii) has stated it has taken or intends to take in a report prepared under section 7.12A(4)(a); and*
  - *(iii) has otherwise decided to take in response to a report or recommendation referred to in paragraph (a) or (b); and*
  - *(iv) has stated it has done or proposes to do in written advice prepared under section 8.6(1)(a) or 8.23(4)(a);*

(d) any other function conferred on the audit, risk and improvement committee under these regulations or another written law.

Local Government (Audit) Regulations 1996, regulation 17:

(1) The CEO must review the appropriateness and effectiveness of the local government's systems and procedures in relation to the following matters —

(a) financial management;

(b) legislative compliance;

(c) risk management.

(2) Under subregulation (1), the CEO may review any or all of the matters referred to in subregulation (1)(a) to (c) at any time but must review each of those matters not less than once in every 4 financial years.

(3) The CEO must report to the audit, risk and improvement committee the results of each review carried out under subregulation (1).

FINANCIAL AND RESOURCE IMPLICATIONS:
Provision is made in the budget to undertake reviews as required.

INTEGRATED PLANNING LINKS:

Strategic Theme: Leading	**A progressive City where informed decisions, strong advocacy and an enabling culture drives sustainable regional growth.**
Goal 2	Efficiently and effectively deliver community services and projects, through optimal use of our resources.
Goal 6	Ensure high quality governance activities enabling transparency and accountability.

REGIONAL OUTCOMES:
There are no impacts to regional outcomes.

RISK MANAGEMENT:
Auditable areas were identified by the Internal Auditor in conjunction with management, and defined in terms of the business risks, critical success factors and specific risk-based criteria. The criteria used to rank each area are as follows:

- Materiality/size – high priority was given to areas which involved larger dollar amounts
- Strategic Importance – effort directed towards activities that are significant to the achievement of corporate objectives
- Control Environment – consideration was given to the status of the current control environment
- Inherent Risk – the level of risk associated with the nature of the underlying assets, or the operations conducted by the activity
- Regulatory Compliance – it is compulsory to comply with relevant legislation and regulations due to the nature of the industry.

ALTERNATIVE OPTIONS CONSIDERED BY CITY OFFICERS:

That the Audit, Risk and Improvement Committee by Simple Majority pursuant to Section 7.1CA of the *Local Government Act 1995* RESOLVES to:

1. ENDORSE the auditable areas for 2027:
    a. As determined by the Committee
    b. And the reason for the change is (as determined by the Committee).

AC193 GERALDTON AIRPORT – DEPARTMENT OF HOME AFFAIRS AUDIT

AGENDA REFERENCE:	**D-26-081937**
AUTHOR:	**A Freers, Manager Geraldton Airport**
EXECUTIVE:	**P Radalj, Director Corporate Services**
DATE OF REPORT:	**19 June 2026**
FILE REFERENCE:	**GO/11/0020-003**
ATTACHMENTS:	**Yes (x2) Confidential** **B. Confidential - CISC - Compliance Audit Findings Letter - COMP-8028** **A. Confidential - CISC Acknowledgement of Responses**

EXECUTIVE SUMMARY:
The Critical Infrastructure Security Centre (CISC), within the Department of Home Affairs, conducts cyclical airport audits to assess compliance with regulatory requirements. Geraldton Airport was audited in May 2026, with the findings presented to the City on 9 June 2026.

This report and its attachments summarise the audit findings, including non-compliance notifications and observations. All non-compliance notifications were addressed either immediately or within the 21-day timeframe required by CISC.

Whilst all meetings of a committee are to be open to members of the public pursuant to section 5.23 of the Local Government Act 1995. A meeting may be closed pursuant to section 5.23(4) of the Local Government Act 1995 to the extent necessary to ensure that the information is dealt with at the meeting on a confidential basis – (e) information the making public of which would be likely to endanger the security (including cyber-security) of any of the local government's property or operations.

EXECUTIVE RECOMMENDATION:
That the Audit, Risk and Improvement Committee by Simple Majority pursuant to Section 7.1CA of the *Local Government Act 1995* RESOLVES to:

1. RECEIVE - CISC - Compliance Audit Findings Letter - COMP-8028 – 09 June 2026.
2. RECEIVE - CISC – Acknowledgement and CGG Responses 29 June 2026.

PROPONENT:
The proponent is the City of Greater Geraldton.

BACKGROUND:
Between 25 May and 29 May 2026, a security compliance audit was conducted at City of Greater Geraldton (Geraldton Airport) by Aviation Security Inspectors (ASIs) from the Critical Infrastructure Security Centre (CISC).

The audit covered:

- Passenger screening
- Checked baggage screening
- Access control measures and procedures
- Aviation Security Identification Card (ASIC)/Visitor Identification Card (VIC) display
- Incident reporting
- Screening officer training records
- Screener Accreditation
- Airport security management
- CCTV review
- Front of House, Landside and Airside Areas and Zones

ASIs identified that Geraldton Airport failed to meet its security obligations and issued 18 Non-Compliance Notifications and 8 Observation Notices. As previously denoted in this item, the Non-Compliance Notifications have all been remedied and actions are now being taken to "close-out" the Observation Notices.

CONNECTED, LIVEABLE, THRIVING, LEADING – ISSUES AND OPPORTUNITIES:

Connected:
Ensuring that the Airport is well prepared meeting aviation security requirements supports the provision of safe public spaces.

Liveable:
The Airport provides a key transport option for the community with connectivity to Perth and the Northwest.

Thriving:
A safe and compliant airport supports existing businesses and tourists, which in turn makes the City a more accessible destination.

Leading:
Approval of the Geraldton Airport Transport Security Program (regulatory document required under the Aviation Transport Security Act 2004) on 11 May 2026 and the acquittal of all Non-Compliance demonstrates the City's commitment to high quality governance.

RELEVANT PRECEDENTS:
There are no relevant precedents.

COMMUNITY/COUNCIL MEMBER CONSULTATION:
N/A

LEGISLATIVE/POLICY IMPLICATIONS:
There are legislative implications.

- *Aviation Transport Security Act 2004*
- *Aviation Transport Security Regulations 2005*
- Applicable aviation screening notices that have been issued to Geraldton Airport

- Security measures detailed in the Geraldton Airport - Transport Security Program (TSP) 11 May 2026.

FINANCIAL AND RESOURCE IMPLICATIONS:
The financial and resource implications associated with addressing the notifications were not material and were managed within the existing operating budget.

INTEGRATED PLANNING LINKS:

Strategic Theme: Leading	**A progressive City where informed decisions, strong advocacy and an enabling culture drives sustainable regional growth.**
Goal 2	Efficiently and effectively deliver community services and projects, through optimal use of our resources.
Goal 6	Ensure high quality governance activities enabling transparency and accountability.

REGIONAL OUTCOMES:
The airport provides a critical service to the region and ensuring its continued operations supports the region.

RISK MANAGEMENT:
All 18 Non-Compliance Notifications and 8 Observation Notices were entered into the Geraldton Airport OneReg Action Register.

Responses to each Non-Compliance Notification were submitted to CISC, outlining the specific remediation measures implemented and providing evidence to demonstrate closure of the identified issues.

ALTERNATIVE OPTIONS CONSIDERED BY CITY OFFICERS:
No alternative options were considered by City Officers

AC194 AUDIT COMMITTEE – 2026 CYBERSECURITY RISK REDUCTION ACTIVITIES

AGENDA REFERENCE:	**D-26-081212**
AUTHOR:	**S Bishop, Manager ICT Services**
EXECUTIVE:	**P Radalj, Director Corporate Services**
DATE OF REPORT:	**10 July 2026**
FILE REFERENCE:	**GO/11/0020**
ATTACHMENTS:	**A. Confidential – Security testing – 2026 Findings summary** **B. Confidential – OSG – City of Greater Geraldton – Internal Penetration Test - Report**

This Item has been provided to the Audit, Risk and Improvement Committee under separate cover.

Note: This report to the Audit, Risk and Improvement Committee has been listed as confidential, to ensure that the information is dealt with at the meeting on a confidential basis per section 5.23(4) of the Local Government Act 1995. The report and information fall within the scope of provision 5.23(4)(e) - information the making public of which would be likely to endanger the security (including cyber-security) of any of the local government's property or operations.

5 GENERAL BUSINESS LATE ITEM

6 MEETING CLOSURE