

Corrupt Conduct Prevention Policy

1. Scope

This policy applies to all West Moreton Hospital and Health Service (WMH) employees and all organisations and individuals acting as its agents (including contractors, consultants, and volunteers).

2. Policy Statement / Commitment

WMH is committed to:

- respecting, protecting and promoting human rights
- embedding and promoting an ethical culture at all levels of WMH, including achieving high standards of ethical conduct amongst its staff
- a zero tolerance for corrupt conduct.

These commitments are supported by a hierarchy of governance and controls which will continue to build an ethical organisational culture.

WMH has adopted a structured governance framework and an integrated approach to the development, implementation and regular review of corrupt conduct prevention and detection, monitoring, reporting and response strategies. The framework is based on:

- the Australian Standards Fraud and Corruption Control (AS 8001:2021, Fraud and Corruption Control)
- the Crime and Corruption Commission Fraud and Corruption Control Guideline for Best Practice (2018)
- the Department of Health's Fraud Control Policy, Guideline and Implementation Standard
- the Crime and Corruption Commission's Corruption in Focus: A guide to dealing with corrupt conduct in the Queensland public sector (2023)
- the principles outlined in the Code of Conduct for the Queensland Public Service (Code of Conduct).

The effective mitigation of corrupt conduct risks can only occur through the implementation of a well thought out corrupt conduct prevention framework designed specifically for WMH. It is important to ensure that the corrupt conduct prevention framework is complete and that all components, including those of the integrity framework, work to support each other.

Proper application and management of all components of the framework requires a high level of coordination, for which the primary tools are:

- the Corrupt Conduct Prevention Policy (the Policy) and related attachments
- the Reporting Corrupt Conduct Procedure (the Procedure)
- the Corrupt Conduct Prevention Action Plan (the Action Plan)

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The Policy and related information on WMH Corrupt Conduct intranet page is intended to:

- clearly communicate WMH's commitment to corrupt conduct prevention
- articulate the commitment of the Chief Executive to corrupt conduct prevention
- be based on a risk management approach
- outline its scope and how it will be applied at all levels of the organisation,
- identify the key factors that influence corrupt conduct
- refer to any relevant legislation
- state who is covered
- identify any role that has particular responsibilities and accountabilities
- identify enforcement measures
- include version control and review arrangements.

The Procedure explains how suspected corrupt conduct can be report by employees and members of the public and how WMH will manage such disclosures.

The Action Plan sets out WMH's ongoing efforts to mature its corrupt conduct prevention framework. Appropriate oversight will ensure that the Policy, Procedure and Action Plan communicates WMH's commitment to best practice and create a holistic framework that minimises the risks of corrupt conduct and reinforces organisational integrity.

Within WMH, the Workplace Relations Unit, within the People and Culture division, are responsible for overseeing the implementation of WMH's corrupt conduct prevention framework, in close consultation with relevant internal stakeholders.

Development of this Policy and the related attachments, the associated Action Plan and related Procedure are only part of the overall process of implementing an effective corrupt conduct prevention program. Communication of the Policy, Action Plan and Procedure is critical.

The Policy, Action Plan and Procedure will be made available to all employees of WMH.

Further, WMH is committed to provided training to develop awareness in employees, stakeholders, and the community that corrupt conduct is not acceptable, and that WMH operates on a zero-tolerance basis.

The Policy, Action Plan and Procedure will be reviewed every two years, consistent with the Australian Standard AS8001:2008 and WMH Document Management Procedure.

The other essential elements of WMH's corrupt conduct prevention approach are outlined below, with further details contained on WMH's Corrupt Conduct intranet page:

- Risk management systems
- Internal controls
- Reporting processes
- Protections and support for disclosers
- External reporting
- Investigation management processes
- Code of Conduct
- Organisational culture change program
- Client and community awareness program.

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3. Non-Compliance

Non-compliance with this policy will be managed in accordance with the Compliance Management Procedure, Compliance Breach Reporting Procedure, HR Policy E10 Discipline and A Just Culture Policy.

4. Monitoring and Evaluation

Level of risk	Low
What will be monitored	2025 Corrupt Conduct Prevention Action Plan and procedure compliance and currency
How (method)	Review the delivery of the 2025 Corrupt Conduct Prevention Action Plan tasks against the projected timeframe with progress reporting to the Chief Executive and Board. Analysis of WMH's compliance with policy requirements
Frequency	Every Four years
Responsible officer	Manager, Human Resources
Reporting to	Executive Director, People and Culture, Chief Executive and Board

5. Related West Moreton Documents

Policy and Procedure Documents	<ul style="list-style-type: none"> • Compliance Breach Reporting Procedure • Compliance Management Procedure • Corrupt Conduct complaint involving the Chief Executive or a Board Member • Corrupt Conduct Prevention Procedure • Financial Management Practice Manual (FMPM) • A Just Culture Policy • Public Interest Disclosure Procedure • Risk Management Procedure • Reporting Corrupt Conduct Procedure • Risk and Compliance Management Framework • Risk Management Guideline • Risk Management Policy
External Documents	<ul style="list-style-type: none"> • Code of Conduct for the Queensland Public Service • Crime and Corruption Commission Fraud and Corruption Control Guideline for Best Practice (2018) • Discipline HR Policy E10 • Public Service Commission: Gifts and Benefits Directive 22/09 • Public Service Commission: Commission Chief Executive Guideline: Discipline • Public Service Commission: Gifts and Benefits Guideline • Recruitment and Selection Policy HR Policy B1

6. Compliance Requirements and Obligations

Legislation and other compliance requirements	<ul style="list-style-type: none"> • Auditor-General Act 2009 • Crime and Corruption Act 2001 • Criminal Code Act 1899 • Criminal Proceeds Confiscation Act 2002 • Financial Accountability Act 2009 • Financial and Performance Management Standard 2009 • Hospital and Health Boards Act 2011 • Human Rights Act 2019 • Information Privacy Act 2009 • Integrity Act 2009 • Police Service Administration Act 1990 • Public Interest Disclosures Act 2010 • Public Sector Ethics Act 1994 • Public Sector Act 2022 • Right to Information Act 2009
National Safety and Quality Health Service (NSQHS) Standards	 1. Clinical Governance
Other Standards	<ul style="list-style-type: none"> • AS 8001:2021, Fraud and Corruption Control • AS/NZS ISO 31000:2018 Risk Management –Guidelines • Auditing Standard ASA 240 – The Auditor’s Responsibilities Relating to Fraud in an Audit of a Financial Report • AS ISO 37301:2021 – Compliance Management Systems

7. Definition/s

Term	Definition	Source
Collusion	Secret or illegal cooperation or conspiracy in order to deceive others; Law collusion between ostensible opponents in a lawsuit.	Oxford Dictionary
Fand corruption	Fraud is normally characterised by some form of deliberate deception in order to obtain a benefit. The official definition is as per AS8001-2008: Dishonest activity causing actual or potential financial loss to any person or entity including theft of moneys or other property by employees or persons external to the entity and whether or not deception is used at the time, immediately before or immediately following the activity. This also includes the deliberate falsification, concealment, destruction or use of falsified documentation used or intended for use for a normal business purpose or the improper use of information or position.	AS8001-2021

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	Corruption involves a breach of trust in the performance of official duties.	
Fraud	<p>Dishonest activity causing actual or potential financial loss to any person or entity including theft of moneys or other property by employees or persons external to the entity and where deception is used at the time, immediately before or immediately following the activity. This also includes the deliberate falsification, concealment, destruction or use of falsified documentation used or intended for use for a normal business purpose or the improper use of information or position for personal financial benefit.</p> <p><i>For example: false claims on a CV, using a cab voucher for personal travel, falsely making a claim on a timesheet, false invoicing, unauthorised use of credit cards, theft of intellectual property or other confidential information.</i></p>	Criminal Code Act 1899 AS8001-2021
Natural Justice	<p>Natural justice is an administrative law principle that provides for fairness in decision-making. It is concerned with ensuring that an objective decision maker reaches a procedurally fair decision. Natural justice has two rules:</p> <ul style="list-style-type: none"> • Rule against bias: decision-makers are to be objective, free of bias, and have no personal interest in the matter being decided. • Hearing rule: an individual is to be informed of the substance of an allegation/s against them and have the opportunity to present their case prior to a decision being made. 	Public Service Commission: Commission Chief Executive Guideline: Discipline
Corrupt Conduct	<p>Meaning of corrupt conduct</p> <p>(1) Corrupt conduct means conduct of a person, regardless of whether the person holds or held an appointment, that—</p> <p>(a) adversely affects, or could adversely affect, directly or indirectly, the performance of functions or the exercise of powers of—</p> <p>(i) a unit of public administration; or</p> <p>(ii) a person holding an appointment; and</p> <p>(b) results, or could result, directly or indirectly, in the performance of functions or the exercise of powers mentioned in paragraph (a) in a way that—</p> <p>(i) is not honest or is not impartial; or</p> <p>(ii) involves a breach of the trust placed in a person holding an appointment, either knowingly or recklessly; or</p> <p>(iii) involves a misuse of information or material acquired in or in connection with the performance of functions or the exercise of powers of a person holding an appointment; and</p>	Section 15, <i>Crime and Corruption Act 2001</i>

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	(c) is engaged in for the purpose of providing a benefit to the person or another person or causing a detriment to another person; and (d) would, if proved, be— (i) a criminal offence; or (ii) a disciplinary breach providing reasonable grounds for terminating the person’s services, if the person is or were the holder of an appointment.	
Public Interest Disclosure	Public interest disclosure is a disclosure under Chapter 11 of the <i>Public Interest Disclosure Act 2010</i> and includes all information and help given by the discloser to a proper authority for the disclosure.	Section 11, <i>Public Interest Disclosure Act 2010</i>
Staff/Employees (including contractors and consultants)	For the purposes of this policy the term “staff” refers to all WMH employees, and all individuals acting as its agents.	
Stealing/theft	Theft is dealt with under sections 391 of the <i>Criminal Code Act 1899</i> . For example: an employee steals a laptop belonging to WMH without consent and with the intention of not returning the laptop.	Section 391, <i>Criminal Code Act 1899</i>

8. Development, Revision and Approval History

ID & Version No.	Approval Date	Effective Date	Review Date	Document Custodian / Author	Endorsing Committee	Approving Authority
WMHHS2014327v4 (Procedure)	08/09/2023		08/09/2026	Corrupt Conduct Liaison Officer (Principal Workplace Relations Officer)		Chief Executive
WMHHS2014327v5 (Policy)	21/08/2025		21/08/2029	Manager, Human Resources	Executive Leadership Committee – <i>endorsed 21.08.2025</i>	Chief Executive
Summary of changes						
<input checked="" type="checkbox"/> Major review – Procedure converted to a policy and content updated in alignment with the Crime and Corruption Commission’s standards.						

9. Key Words

Corrupt conduct, corruption, prevention, public interest disclosure, reporting, fraud, control, suspicious conduct, crime.

10. Appendices

Nil