

Fraud Control Policy

Airservices regards and treats fraud seriously and will not accept fraudulent behaviour, including corruption.

Airservices is committed to establishing and maintaining strong and effective fraud control arrangements that are consistent with Rule 10 of the *Public Governance, Performance and Accountability Rule 2014* (PGPA Fraud Rule).

Airservices approach to fraud control includes:

- Conducting fraud risk assessments to update the Ethics and Fraud Control Plan biannually or earlier in response to substantial changes in the structure, functions or activities of Airservices
- Maintaining and publishing an Ethics and Fraud Control Plan that deals with identified risks as soon as practicable after conducting a risk assessment, documents Airservices approach to controlling fraud and encompasses governance, prevention, detection, response and monitoring, evaluation and reporting activities
- Maintaining appropriate mechanisms for detecting and preventing fraud including the provision of mandatory fraud awareness training for employees to ensure awareness of what constitutes fraud
- Responding to fraud confidentially and in accordance with our documented processes and the *Australian Government Investigations Standards* (AGIS) while maintaining, supporting and fully respecting the confidentiality of any person reporting suspected or detected fraud subject to any requirements or limitations under the *Privacy Act 1988* or legislation regulating the disclosure of information
- Referring fraud cases to law enforcement agencies where deemed appropriate
- Seeking recovery of losses associated with fraud wherever possible
- Documenting and maintaining data and records on all reported fraud incidents and fraud control for reporting purposes
- Ensuring staff involved in fraud control activities are suitably qualified
- Fostering and maintaining the highest standards of ethical behaviour

All Airservices employees, consultants and contractors must take into account the need to detect and prevent fraud when planning and conducting activities required of Airservices and must report any case of suspected or detected fraud to an Airservices Senior Leadership Team (SLT) member, the Manager, Security & Resilience or the Ethics Manager per published procedures. Reports made to the SLT must be reported to the Manager, Security & Resilience or the Ethics Manager.

A public official can also report fraud confidentially to an Airservices Public Interest Disclosure (PID) Authorised Officer or to the Airservices Ethics Hotline. The Airservices Ethics Hotline can also be used by non-public officials to report fraud.

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Background	This policy establishes the fraud control policy framework to manage the prevention and detection of fraud, the related investigation and where appropriate, referral of matters to law enforcement. This framework is a requirement of the PGPA Act 2013 which Airservices is required to comply with. Fraud Control strategies are an integral part of Airservices culture, Code of Conduct and ethical framework processes and practices.	
Legal framework and authority	<i>Public Governance, Performance and Accountability Act 2013 (PGPA Act 2013)</i>	
Responsibility	This policy applies to officials as defined by the PGPA Act (i.e. Board members and Airservices employees (including labour hires)). It also applies to consultants and contractors.	
Definitions and explanation	<p>Fraud is defined as 'dishonestly obtaining a benefit (tangible or intangible), or causing a loss, by deception or other means which includes (but is not limited to):</p> <ul style="list-style-type: none"> • theft • accounting fraud (e.g. false invoices, misappropriation) • unlawful use of, or unlawful obtaining of, property, equipment, material or services • causing a loss, or avoiding and/or creating a liability • providing false or misleading information to Airservices, or failing to provide information when there is an obligation to do so • misuse of Airservices assets, equipment or facilities • making, or using false, forged or falsified documents • cartel conduct • making, or using, false, forged or falsified documents • wrongfully using Airservices information or intellectual property. 	
Further guidance and key links	<p><i>Board Governance Manual</i> <i>PGPA Act (includes definition of a Public Official)</i> <i>Australian Government Investigation Standards</i> <i>Criminal Code Act 1995 (Commonwealth)</i> <i>Crimes Act 1914</i> <i>Airservices Ethics and Fraud Control Plan (C-MAN0030)</i> <i>Airservices Public Interest Disclosure Procedure (C-PROC0261)</i> <i>Airservices Ethics Hotline Procedure</i> <i>Airservices Induction Process and Management Procedure (PROC-202)</i></p>	
Contacts	Ethics Manager and/or Manager, Security and Resilience	
Functional authority	Executive General Manager, Safety, Environment and Assurance	
Approval	Margaret Staib Chief Executive Officer on behalf of the Board	
Change summary		
Version	Amendments	Date
6		22 February 2015