



## FRAUD AND CORRUPTION PREVENTION PLAN

### PURPOSE

The purpose of this Fraud and Corruption Prevention Plan is to detail strategies and actions to be implemented by Council in order to mitigate and control the risk of fraud and corruption across the organisation. The plan also defines accountabilities and timeframes within which these actions are to be implemented and monitored by Council.

### SCOPE

Hunter's Hill Council is committed to good governance and ethical behaviour. A key element of any good governance framework is an effective fraud and corruption prevention plan. Fraud and corruption can be a significant drain on Council's resources and can damage Council's reputation. The community and other stakeholders expect that Council will put in place appropriate systems to reduce these risks.

Council has adopted a Fraud and Corruption Prevention Policy which establishes Council's commitment to managing fraud and corruption risks. This Policy requires Council to develop and implement a Fraud and Corruption Prevention Plan to assist managers to meet their fraud and corruption control responsibilities.

### DEFINITIONS

Corruption has a broad meaning. 'Corrupt conduct' is defined in Sections 8 and 9 of the Independent Commission Against Corruption Act 1988 (ICAC Act):

<p><b>General nature of corrupt conduct</b></p>	<p>(1) Corrupt conduct is:</p> <ul style="list-style-type: none"> <li>(a) any conduct of any person (whether or not a public official) that adversely affects, or that could adversely affect, either directly or indirectly, the honest or impartial exercise of official functions by any public official, any group or body of public officials or any public authority, or</li> <li>(b) any conduct of a public official that constitutes or involves the dishonest or partial exercise of any of his or her official functions, or</li> <li>(c) any conduct of a public official or former public official that constitutes or involves a breach of public trust, or</li> <li>(d) any conduct of a public official or former public official that involves the misuse of information or material that he or she has acquired in the course</li> </ul>
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	<p>of his or her official functions, whether or not for his or her benefit or for the benefit of any other person.</p> <p>(2) Corrupt conduct is also any conduct of any person (whether or not a public official) that adversely affects, or that could adversely affect, either directly or indirectly, the exercise of official functions by any public official, any group or body of public officials or any public authority and which could involve any of the following matters:</p> <ul style="list-style-type: none"> <li>(a) official misconduct (including breach of trust, fraud in office, nonfeasance, misfeasance, malfeasance, oppression, extortion or imposition),</li> <li>(b) bribery,</li> <li>(c) blackmail,</li> <li>(d) obtaining or offering secret commissions,</li> <li>(e) fraud,</li> <li>(f) theft,</li> <li>(g) perverting the course of justice,</li> <li>(h) embezzlement,</li> <li>(i) election bribery,</li> <li>(j) election funding offences,</li> <li>(k) election fraud,</li> <li>(l) treating,</li> <li>(m) tax evasion,</li> <li>(n) revenue evasion,</li> <li>(o) currency violations,</li> <li>(p) illegal drug dealings,</li> <li>(q) illegal gambling,</li> <li>(r) obtaining financial benefit by vice engaged in by others,</li> <li>(s) bankruptcy and company violations,</li> <li>(t) harbouring criminals,</li> <li>(u) forgery,</li> <li>(v) treason or other offences against the Sovereign,</li> <li>(w) homicide or violence,</li> <li>(x) matters of the same or a similar nature to any listed above,</li> <li>(y) any conspiracy or attempt in relation to any of the above."</li> </ul>
<p><b>Fraud</b></p>	<p>Defined in the NSW Crimes Act 1900 as dishonestly obtaining property belonging to another person or obtaining any financial advantage or causing any financial disadvantage by deception.</p>



## POLICY STATEMENT

### PART 1 POLICY GUIDELINES

Council's plan for fraud and corruption prevention will focus on the following broad areas:

- Creating a culture of ethical behaviour across all areas of the organisation through strong leadership, education and training.
- Incorporating the management of fraud and corruption risks into the broader Enterprise Risk Management framework whereby such risks are regularly identified, analysed, monitored and reviewed.
- Developing and implementing a strong internal control framework with a focus on preventing and detecting fraud and corruption.
- Promoting and encouraging the reporting and investigation of suspected fraud or corruption

Specific strategies for improving the management of fraud and corruption risks are detailed in the "Proposed Additional Controls/Strategies" columns in Appendix A and B.

#### 1. FRAUD AND CORRUPTION RISK MANAGEMENT

Given the nature and breadth of Council's operations, there will always be an inherent risk of fraud and corruption. Accordingly the first step in any fraud and corruption prevention strategy is to identify and analyse potential fraud and corruption risks.

Hunters Hill Council identifies fraud and corruption risks as part of its overarching Enterprise Risk Management program (currently facilitated by Inconsult). This will involve ensuring that fraud and corruption risks are included in Council's corporate risk register which is reviewed on a biannual basis. In addition Council will undertake a specific fraud and corruption risk assessment every four years that at least assesses high risk areas and functions.



## 2. FRAUD AND CORRUPTION CONTROL

Hunters Hill Council will adopt a two tiered approach to managing fraud and corruption risks. The first tier will involve corporate fraud and corruption prevention controls that are designed to apply across all functions and departments of the organisation (Tier 1 controls). The current Tier 1 controls and proposed future initiatives are summarised in Appendix A.

The second tier involves controls that are specific to a particular fraud and corruption risk area. Previous fraud and corruption risk assessments have identified a number of Council functions that, due to their nature, have a high inherent risk of fraud or corruption. These areas and the specific strategies/controls currently in place (and proposed) to manage the risk (Tier 2 controls) are summarised in Appendix B.

## 3. MONITORING AND REVIEW

This Plan is designed to be a living document. The management of fraud and corruption risks is an ongoing process that requires constant monitoring and review. This Plan will be reviewed annually.

## RELATED RESOURCES

Code of Conduct

Public Interest Disclosures Policy and Internal Reporting Procedure

Statement of Business Ethics

Disclosure of Interests Policy

Risk Management Policy and Strategy

## POLICY OWNER

The policy authority is the General Manager.

## AUTHORISATION AND REVIEW

### Next Review Date

This Plan is designed to be a living document. The management of fraud and corruption risks is an ongoing process that requires constant monitoring and review. This Plan will be reviewed annually.



## APPENDIX A

### CORPORATE (TIER 1) FRAUD AND CORRUPTION PREVENTION ACTIONS

Risk Area	Inherent Risk	Summary of Existing Controls	Residual Risk	Proposed Additional Controls/ Strategies	Responsible Officer	Due Date
General risk of fraud and corruption across the organisation	Extreme	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Code of Conduct training</li> <li>• Annual Corruption training</li> <li>• All new staff required to sign off that they agree to abide by Code of Conduct</li> <li>• Gifts and Benefits procedures</li> <li>• Disclosure of Interests Policy</li> <li>• Public Interest Disclosures Policy</li> <li>• Protocol on councillor contact with staff</li> <li>• Internal audit considers fraud and corruption risks as part of audit assignments</li> <li>• Fraud and corruption risks included in corporate risk register which is reviewed biannually</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Develop an ongoing program of Code of Conduct training for all staff</li> </ul>	HR Manager in conjunction with GM and Group Managers	
Fraud or corruption by councillors	Extreme	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Code of Conduct training</li> <li>• Declaration of interest process at meetings</li> <li>• Management response to Notices of Motion and Mayoral Minutes</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Provide ICAC training to councillors on fraud and corruption and particularly interactions with developers</li> </ul>	General Manager and HR Manager	



## APPENDIX B

### FUNCTION SPECIFIC (TIER 2) FRAUD AND CORRUPTION PREVENTION STRATEGIES FOR HIGH RISK AREAS

#### *Risk Area – Misappropriation of Cash*

Organisation Unit	Risk	Inherent Risk	Summary of Existing Controls	Residual Risk	Proposed Additional Controls/ Strategies	Responsible Officer	Due Date
Community Services	Theft of cash takings by staff	High	<ul style="list-style-type: none"> <li>• Cash stored in safe</li> <li>• Reconciliation by Finance staff</li> <li>• Reconciliation signed off by staff member</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Ongoing monitoring of existing controls</li> </ul>	Group Manager, Corporate Governance	Ongoing
Customer Services	Customer Service Officer charges customer more than required fee and pockets difference	High	<ul style="list-style-type: none"> <li>• Receipts issued for all transactions</li> <li>• Regular monitoring of debtor accounts</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Ensure new customer service staff receive appropriate induction for processing of financial transactions</li> </ul>	Group Manager, Corporate Governance	Ongoing
Customer Services	Customer Service Officer steals cash from float	High	<ul style="list-style-type: none"> <li>• Daily balancing checked by supervisor</li> <li>• Reconciliation of daily balance with banking</li> <li>• Rotation of staff</li> <li>• Unique user log ins</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Ongoing monitoring of existing controls</li> </ul>	Group Manager, Corporate Governance	Ongoing

# HUNTER'S HILL COUNCIL POLICY REGISTER



Organisation Unit	Risk	Inherent Risk	Summary of Existing Controls	Residual Risk	Proposed Additional Controls/ Strategies	Responsible Officer	Due Date
Finance	Cash stolen by staff before banking	High	<ul style="list-style-type: none"> <li>• Cash stored in safe</li> <li>• Daily bank reconciliation</li> <li>• System alert if collected cash unreconciled for more than 7 days</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Ongoing monitoring of existing controls</li> </ul>	Group Manager, Corporate Governance	Ongoing
Finance	Theft of petty cash by staff	Low	<ul style="list-style-type: none"> <li>• Documented petty cash procedures</li> <li>• Encouraging use of credit cards rather than petty cash</li> <li>• Regular reconciliation of floats by custodians</li> <li>• Rotating audits of petty cash floats</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Ongoing monitoring of existing controls</li> </ul>	Group Manager, Corporate Governance	Ongoing

# HUNTER'S HILL COUNCIL POLICY REGISTER



## Risk Area – Procurement

Organisation Unit	Risk	Inherent Risk	Summary of Existing Controls	Residual Risk	Proposed Additional Controls/ Strategies	Responsible Officer	Due Date
Finance	Accepting a bribe or inducement in return for purchasing goods or services	Very High	<ul style="list-style-type: none"> <li>• Gifts and Benefits Policy</li> <li>• Policy on not sharing system passwords</li> <li>• Preferred supplier arrangements</li> <li>• Purchase order system aligned with delegation limits</li> <li>• Purchase orders reviewed by Procurement Officer before release</li> <li>• Separation between receiving officer and person authorising invoice</li> <li>• Statement of Business Ethics</li> <li>• Tender documents include advice on not providing gifts</li> <li>• Thresholds for number of quotes required</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Review Council's Statement of Business Ethics and methods of disseminating this to suppliers</li> </ul>	Group Manager Corporate Governance	Ongoing
Finance	Manipulation of selection process to favour a	Very High	<ul style="list-style-type: none"> <li>• Conflict of interest declaration signed by tender panel members</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Ongoing monitoring of existing controls</li> </ul>	Group Manager	Ongoing



# HUNTER'S HILL COUNCIL POLICY REGISTER



Organisation Unit	Risk	Inherent Risk	Summary of Existing Controls	Residual Risk	Proposed Additional Controls/ Strategies	Responsible Officer	Due Date
	particular supplier		<ul style="list-style-type: none"> <li>• Documented evaluation process</li> <li>• Procurement Policy and Procedure</li> </ul>			Corporate Governance	
Finance	Payment of incorrect or fraudulent invoices.	High	<ul style="list-style-type: none"> <li>• Invoices matched to purchase order</li> <li>• Payment made to creditor bank account details in system not on invoice</li> <li>• Regular budget and stock control</li> <li>• Separation between receiving officer and person authorising invoice</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Develop a system for ensuring that all material variations between invoice and purchase order amounts are flagged and explanations sought from procuring officer</li> </ul>	Group Manager Corporate Governance	Ongoing
Finance	Purchasing goods or services from suppliers in whom the officer has a private interest	Very High	<ul style="list-style-type: none"> <li>• Conflict of interest declaration signed by tender panel members</li> <li>• Preferred supplier arrangements</li> <li>• Purchase order system aligned with delegation limits</li> <li>• Purchase orders reviewed by Procurement Officer before release</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Review system for checking when new suppliers are added that there are not preferred supplier contracts already in place.</li> </ul>	Group Manager Corporate Governance	Ongoing

# HUNTER'S HILL COUNCIL POLICY REGISTER



Organisation Unit	Risk	Inherent Risk	Summary of Existing Controls	Residual Risk	Proposed Additional Controls/ Strategies	Responsible Officer	Due Date
			<ul style="list-style-type: none"> <li>• Separation between receiving officer and person authorising invoice</li> <li>• Thresholds for number of quotes required</li> </ul>				
Finance	Unauthorised purchase of equipment or materials for personal use	High	<ul style="list-style-type: none"> <li>• Procurement Policy and Procedure</li> <li>• Purchase order system aligned with delegation limits</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Develop a policy around responsibility for maintenance and safe custody of mobile devices</li> <li>• Develop an asset register for mobile devices and a process for acquisition and disposal</li> </ul>	Group Manager Corporate Governance	Ongoing
Finance	Use of Council credit cards	Very High	<ul style="list-style-type: none"> <li>• Council credit cards cannot be linked to personal rewards schemes</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Investigate options to enable staff to electronically scan and attach receipts for credit card</li> </ul>	Group Manager Corporate Governance	Ongoing

# HUNTER'S HILL COUNCIL POLICY REGISTER



Organisation Unit	Risk	Inherent Risk	Summary of Existing Controls	Residual Risk	Proposed Additional Controls/ Strategies	Responsible Officer	Due Date
	for private purchases		<ul style="list-style-type: none"> <li>• Credit Card Policy and Procedure</li> <li>• Credit limits based on position</li> <li>• Each transaction acquitted electronically by card holder and supervisor</li> <li>• Receipts sent to Finance but not matched to transactions</li> <li>• Responsible Accounting Officer signs off on GMs purchases</li> <li>• Staff required to sign that they will abide by Policy and Procedure</li> </ul>		purchases to acquittal system		



## Risk Area – Payroll

Organisation Unit	Risk	Inherent Risk	Summary of Existing Controls	Residual Risk	Proposed Additional Controls/ Strategies	Responsible Officer	Due Date
Payroll	Creation of phantom or ghost employee	High	<ul style="list-style-type: none"> <li>Budget Reviews</li> <li>List of new employees sent to all managers</li> <li>Master file change report reviewed by Payroll weekly</li> <li>New employees entered into system by Recruitment not Payroll</li> <li>New employees will appear on Aussoft report</li> </ul>	Low	<ul style="list-style-type: none"> <li>Consider having master file change report reviewed weekly by a staff member who does not have access to add employees to Payroll system</li> </ul>	Payroll Officer	Ongoing
Payroll	Deliberate overpayment of staff	Medium	<ul style="list-style-type: none"> <li>All salary adjustments approved in writing by Manager</li> <li>Aussoft Report showing payments signed off by manager</li> <li>Master file change report review by Payroll weekly</li> <li>Payroll checked by Finance before submission to bank</li> </ul>	Low	<ul style="list-style-type: none"> <li>Ongoing monitoring of existing controls</li> </ul>	Payroll Officer	Ongoing

# HUNTER'S HILL COUNCIL POLICY REGISTER



Organisation Unit	Risk	Inherent Risk	Summary of Existing Controls	Residual Risk	Proposed Additional Controls/ Strategies	Responsible Officer	Due Date
Payroll	Falsification of agency staff timesheets	High	<ul style="list-style-type: none"> <li>• Approval process for engagement of agency staff</li> <li>• Budget Reviews</li> </ul>	Medium	<ul style="list-style-type: none"> <li>• Consider implementing appropriate controls to reduce the chances of agency staff claiming more hours than they have actually worked</li> </ul>	HR Manager	Ongoing
Payroll	Fraudulent payroll deductions	Medium	<ul style="list-style-type: none"> <li>• All deduction requests must be in writing</li> <li>• Onus on staff to check payslips</li> <li>• Reconciliation of super deductions</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Ongoing monitoring of existing controls</li> </ul>	Payroll Officer	Ongoing
Payroll	Fraudulent sick leave claims by staff	High	<ul style="list-style-type: none"> <li>• Excessive Sick Leave policy</li> <li>• Monthly sick leave report provided to managers</li> <li>• Requirement for medical certificates as per Award</li> <li>• Sick leave noted on timesheets</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Ongoing monitoring of existing controls</li> </ul>	Payroll Officer / HR Manager	Ongoing

# HUNTER'S HILL COUNCIL POLICY REGISTER



Organisation Unit	Risk	Inherent Risk	Summary of Existing Controls	Residual Risk	Proposed Additional Controls/ Strategies	Responsible Officer	Due Date
			<ul style="list-style-type: none"> <li>• System flag if medical certificate not provided</li> </ul>				
Payroll	Fraudulent timesheets and/or time in lieu	High	<ul style="list-style-type: none"> <li>• Report showing extra hours signed off by manager</li> <li>• Monitoring of extra hour patterns</li> <li>• Overtime recorded on time sheet and signed by staff member, supervisor and GM</li> <li>• Regular budget and cost monitoring by management</li> </ul>	Medium	<ul style="list-style-type: none"> <li>• Implement new time in lieu system/forms</li> <li>• Incorporate responsibilities and accountabilities for managing overtime in Managers Cambron (performance review) documentation</li> </ul>	Payroll Officer / HR Manager	New forms implemented in November 2017. Ongoing monitoring.

# HUNTER'S HILL COUNCIL POLICY REGISTER



## Risk Area – Misuse of Resources

Organisation Unit	Risk	Inherent Risk	Summary of Existing Controls	Residual Risk	Proposed Additional Controls/ Strategies	Responsible Officer	Due Date
Works and Services	Accepting a bribe or inducement in return for beneficial provision of works and services	Extreme	<ul style="list-style-type: none"> <li>• Gifts and Benefits Policy</li> <li>• Limited delegations to staff</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Ongoing monitoring of existing controls</li> </ul>	Group Manager Works & Services	
Works and Services	Inappropriate lobbying of staff by councillors or developers to influence decisions relating to the provision of works and services	High	<ul style="list-style-type: none"> <li>• Difficult complainants policy</li> <li>• Documentation of complaints or inappropriate contact</li> <li>• Protocol on councillor contact with staff</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Ongoing monitoring of existing controls</li> </ul>	Group Manager Works & Services	
Works and Services	Staff obtain equipment being disposed of by Council for less than market value	High	<ul style="list-style-type: none"> <li>• All items sold via public auction</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Ongoing monitoring of existing controls</li> </ul>	Group Manager Works & Services	

# HUNTER'S HILL COUNCIL POLICY REGISTER



Organisation Unit	Risk	Inherent Risk	Summary of Existing Controls	Residual Risk	Proposed Additional Controls/ Strategies	Responsible Officer	Due Date
Works and Services	Staff taking collected waste for personal use	High	<ul style="list-style-type: none"> <li>• Procedure on disposal of surplus materials and scrap</li> </ul>	Medium	<ul style="list-style-type: none"> <li>• Review and update Council's procedure for disposal of surplus materials and scrap to provide more specific guidance on regularly recurring scenarios</li> </ul>	Group Manager Works & Services	
Works and Services	Theft of plant or equipment from Depot by staff	High	<ul style="list-style-type: none"> <li>• All items have a plant number</li> <li>• Annual corruption training for staff</li> <li>• Equipment stored in enclosed areas</li> <li>• Loose equipment stored in locked room</li> <li>• Random stocktakes of equipment</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Consider options to improve access security at the Depot e.g. swipe access gates</li> </ul>	Group Manager Works & Services	Ongoing
Works and Services	Theft or misappropriation of Council materials	High	<ul style="list-style-type: none"> <li>• All unused materials have to be returned to Depot</li> <li>• Random audits of works as executed plans</li> <li>• Regular budget review</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Ongoing monitoring of existing controls</li> </ul>	Group Manager Works & Services	Ongoing
Works and Services	Unauthorised use of Council plant and	High	<ul style="list-style-type: none"> <li>• Complaints Management System</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Ongoing monitoring of existing controls</li> </ul>	Group Manager	Ongoing





# HUNTER'S HILL COUNCIL POLICY REGISTER

Organisation Unit	Risk	Inherent Risk	Summary of Existing Controls	Residual Risk	Proposed Additional Controls/ Strategies	Responsible Officer	Due Date
	equipment for personal benefit		<ul style="list-style-type: none"> <li>Monitoring of tipping dockets</li> </ul>			Works & Services	
Corporate Governance	Misuse of office equipment for personal use	Medium	<ul style="list-style-type: none"> <li>Minor usage permitted by Code of Conduct</li> <li>Regular monitoring of mobile phone bills</li> <li>Restrictions on use of photocopiers e.g. swipe card, signage</li> </ul>	Low	<ul style="list-style-type: none"> <li>Ongoing monitoring of existing controls</li> </ul>	Group Manager Corporate Governance	Ongoing
Corporate Governance	Staff accessing and using Council information for private purposes	High	<ul style="list-style-type: none"> <li>Privacy and records management training</li> <li>Privacy Management Plan</li> <li>Random system audits</li> <li>System security</li> </ul>	Low	<ul style="list-style-type: none"> <li>Ongoing monitoring of existing controls</li> </ul>	Group Manager Corporate Governance	Ongoing
Corporate Services	Use of Council resources for secondary employment	High	<ul style="list-style-type: none"> <li>Secondary employment declaration</li> <li>Secondary employment policy</li> </ul>	High	<ul style="list-style-type: none"> <li>Provide an annual reminder to all staff regarding Council's policy on secondary employment including need to declare any such employment and update declarations if circumstances have changed</li> </ul>	HR Manager	Ongoing



# HUNTER'S HILL COUNCIL POLICY REGISTER

Organisation Unit	Risk	Inherent Risk	Summary of Existing Controls	Residual Risk	Proposed Additional Controls/ Strategies	Responsible Officer	Due Date
Information Systems	Theft of computer or office equipment by staff	High	<ul style="list-style-type: none"> <li>• Ability to wipe stolen or lost computers or devices</li> <li>• Code of Conduct</li> <li>• Use of lockable storage</li> </ul>	Medium	<ul style="list-style-type: none"> <li>• Develop an education and cultural change program to reinforce that any theft of Council equipment will not be tolerated.</li> </ul>	Group Manager Corporate Governance	Ongoing

# HUNTER'S HILL COUNCIL POLICY REGISTER

## Risk Area – Development & Regulatory Control

Organisation Unit	Risk	Inherent Risk	Summary of Existing Controls	Residual Risk	Proposed Additional Controls/ Strategies	Responsible Officer	Due Date
Development & Regulatory Control	Accepting a bribe or inducement in return for biased assessment of development application	Extreme	<ul style="list-style-type: none"> <li>• Gifts and Benefits Policy</li> <li>• Limited delegations to staff</li> <li>• Peer review of all applications</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Ongoing monitoring of existing controls</li> </ul>	Group Manager Development & Regulatory Control	Ongoing
Development & Regulatory Control	Inappropriate lobbying of staff by councillors or developers to influence assessment outcome	High	<ul style="list-style-type: none"> <li>• Difficult complainants policy</li> <li>• Documentation of complaints or inappropriate contact</li> <li>• Informal protocols on discussions between staff and developers</li> <li>• Protocol on councillor contact with staff</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Ongoing monitoring of existing controls</li> </ul>	Group Manager Development & Regulatory Control	Ongoing
Development & Regulatory Control	Undisclosed conflict of interest in relation to assessment of development application	High	<ul style="list-style-type: none"> <li>• Annual declaration of interest by Group Managers and Managers</li> <li>• Limited delegations to staff</li> <li>• Peer review of all applications</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Consider including a declaration on assessment checklists that the assessing officer does not have a conflict of interest</li> <li>• Ensure that all conflicts of interest in</li> </ul>	Group Manager Development & Regulatory Control	Ongoing



# HUNTER'S HILL COUNCIL POLICY REGISTER

Organisation Unit	Risk	Inherent Risk	Summary of Existing Controls	Residual Risk	Proposed Additional Controls/ Strategies	Responsible Officer	Due Date
					<p>relation to development assessment are declared in writing on the appropriate form and that manager signs off on any proposed course of action or restrictions</p> <ul style="list-style-type: none"> <li>• Review current level of staff required to complete annual declarations of interest</li> </ul>		
Planning Services	Accepting a bribe or inducement in return for biased assessment of planning proposal	High	<ul style="list-style-type: none"> <li>• All proposals reviewed by Department</li> <li>• Gifts and Benefits Policy</li> <li>• Staff have no delegation to approve</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Ongoing monitoring of existing controls</li> </ul>	Strategic Planner	Ongoing