From: [redacted]
To: PAEC
Cc: [redacted]
Subject: Parliamentary Inquiry into Fraud and Corruption Control in Local Government
Date: Friday, 29 August 2025 4:26:07 PM
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Thank you for your recent correspondence regarding our attendance at hearings for the Public Accounts and Estimates Committee's Inquiry into Fraud and Corruption Control in Local Government.

Please find below our response to your additional questions as requested.

1. Would standardisation across councils be beneficial? What things would you like to have standardised (e.g. policies, processes, reporting, grant assessment criteria)?

   Limited standardisation in the form of a sample Fraud and Corruption policy template would be useful, however Manningham utilises guidance from the Australian Standard AS 8001-2021 Fraud and Corruption Control, the Local Government Act 2020 and the Public Interest Disclosures Act 2012. The accompanying Control System Procedure is heavily guided by these same overarching frameworks, but adapted to our organisational governance, risk management and assurance framework and systems. Process guidance documents and standard templates could be useful. i.e. Fraud and Corruption Register template.

   We do not consider that it would be beneficial to standardise grant assessment criteria across local government, as each council has a range of grant types aligned to specific outcomes. Whilst governance criteria for different grants remains uniform and adapted to the risk exposure, it is necessary to adapt other criteria to the purpose of the grant. Manningham Council offers five grant categories (types), which together include ten different funding streams available to the community

2. How does your council ensure that its Audit and Risk Committee is contributing to best practice controls? For example, how your ARC prioritises its work and meeting agendas and maintains transparency.

   Independent Audit and Risk Committee members are recruited ensuring that they are suitably qualified, have contemporary skills and knowledge. The independent members are on other audit committees and boards and have access to a range of regulatory information updates. They can also pursue professional development opportunities privately (i.e. AICD). VAGO host cyclical online information sessions for Audit and Risk Committee (Committee) members.

   Council's internal auditor provides management and the Committee with quarterly updates on a broad range of regulatory investigation outcomes, best practice reports and legislative updates. The Committee operates to the requirements under the Local Government Act. This is duplicated in their Charter and Workplan together with alignment with best practice guides. The annual Workplan forms the meeting agenda cycle, as well as additional actions arising from meeting content, emerging legislative change or reported regulatory findings that have applicability to Council.

A copy of the Committee meeting minutes is distributed to Councillors and the Audit and Committee Chair reports biannually to Council as per the Local Government Act – Sect 54. This biannual report is included as part of the Council open public meeting agenda and minutes, both of which are published onto Council's website.

3. How adequate do you believe the current consequences/penalties for breaches to the Local Government Act or instances of fraud and corruption are? What would you like to see changed?

   We consider that the current regulatory framework, reporting requirements and organisational policies are adequate to respond to any instances of fraud and corruption.

4. How adequate do you believe current whistleblower protections in the local government sector and how could these protections be improved?

   Victoria possesses a robust legal framework to protect public interests disclosures by staff and the public. However, resource constraints in our integrity agencies and gaps in enforcement weaken real world effectiveness. An increase in funding for integrity agencies would assist with capacity to manage the increasing volume in complaints being received.

<u>Questions for all Councillors</u>

1. How comfortable are you with the current use of confidentially in meetings within your Councils?

   The information below is a consolidation of the responses received from Councillors.

   Councillors are comfortable that Manningham applies confidentiality provisions prudently. Council is committed to transparency and prioritises making as much information available as possible. For example, we consider confidentiality in the context of the entire report and only designate that information that meets the definition as confidential information, for example personal identifiers or commercially sensitive information. The balance of the report remains public.

   Through the CEO KPIs we continue to look for ways to enhance transparency:
   "Provide a briefing on new areas of opportunity for transparency in Council, whilst maintaining existing level of transparency."

2. What have been the barriers and enablers to your council having a culture that makes councillors and council staff feel safe to 'speak up' when they identify fraud or corruption (both internally and formally through Public Interest Disclosures)?

   Council has a strong culture that makes councillors and staff feel safe to speak up. We also have a Whistleblower policy that provides an independent path to identify fraud or corruption.
   Through CEO KPIs Councillors better understand organisational culture and identify where gaps may exist that could impact culture negatively.
   Council also maintains a culture of transparency and no blame. Ie if something has been

done that's a mistake or wrong, speak up without fear. This is how we continually enhance our processes. This no blame culture is a requirement from Councillors to staff and vice versa.

a. Do you feel confident that integrity agencies are willing and able to investigate suspected fraud and corruption incidents in an appropriate and timely manner

We believe that integrity agencies are willing and able to, however findings are not always implemented.

If you require any further information, please do not hesitate to contact me.

Warm regards,

[redacted]

Manningham Council

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Working together
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