

TITLE	Fraud and Corruption Control Plan
TARGET AUDIENCE	All Cabrine employees, consultants, contractors, sub-contractors, casual staff, volunteers, board members and audit and risk management committee members
SCOPE	Cabrine wide

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Executive summary

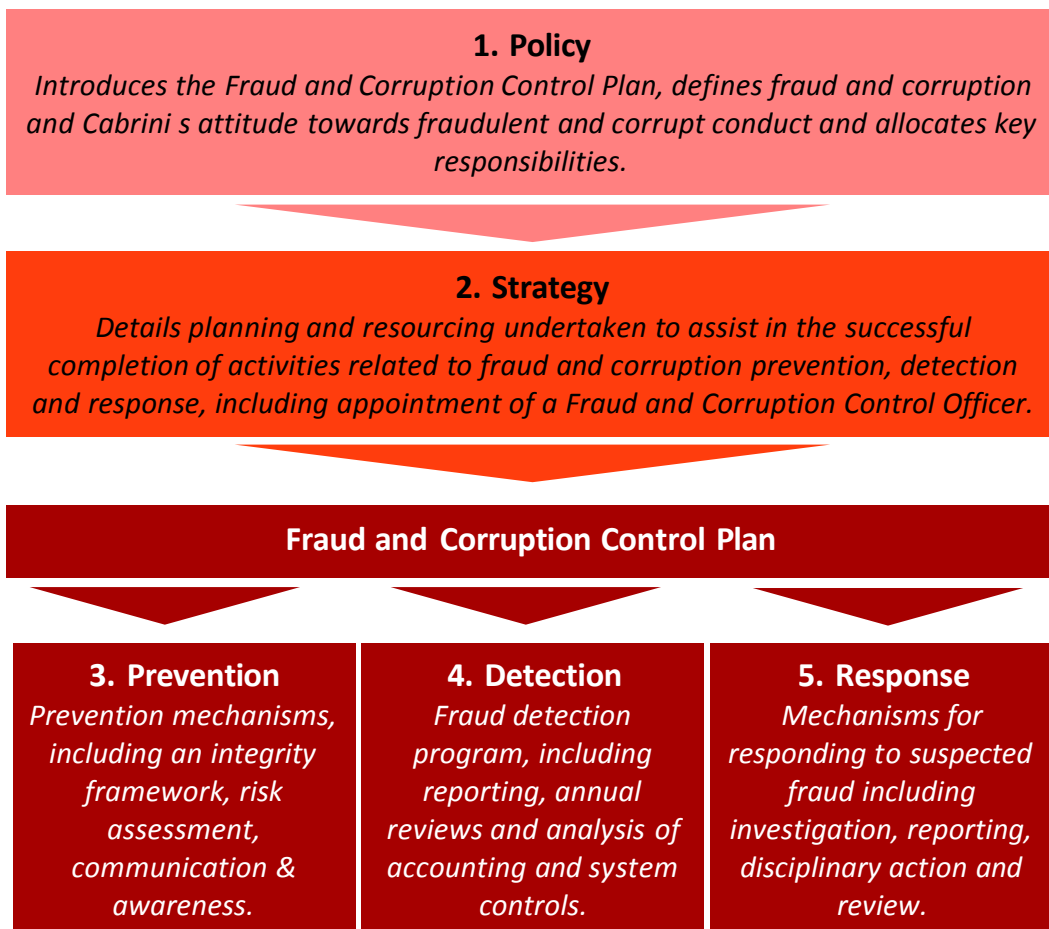
Cabrini recognises that fraud risk management is an integral part of good management practice and is committed to establishing an organisational culture that ensures fraud risk management is embedded in business processes. The introduction of an effective Fraud Corruption and Control Plan is an essential element specifically designed to help ensure Cabrini’s ability to operate with integrity, transparency and at maximum economic efficiency.

The purpose of this document is to formalise and communicate Cabrini’s Fraud and Corruption Control Plan for preventing, detecting and responding to fraud and corruption.

This plan applies to all Cabrini employees, consultants, contractors, sub-contractors, casual staff, volunteers, board members and audit and risk management committee members.

The Fraud and Corruption Control Officer is responsible for the implementation of the Fraud and Corruption Plan, with oversight from the Audit and Risk Management Committee. The Integrity Governance Officer is the central point of contact within Cabrini for reporting instances of actual or potential fraud and corrupt conduct.

The Cabrini Fraud and Corruption Control Plan is based on *Standards Australia AS8001-2008 Fraud and Corruption Control* and is comprised of the following sections:



1. Policy

1.1 Policy Statement

The management of fraud and corruption is a key focus of Cabrini, with the desired outcome being the prevention of all fraud and corruption related incidents related to Cabrini. Cabrini recognises that the nature of fraud is inherently hard to control, however, effort will be made in order to ensure compliance with this policy.

Cabrini's various stakeholders expect employees to act legally and ethically. Cabrini needs to ensure systems, processes and capabilities are in place that mitigate the risk of fraudulent or corrupt activity and enable Cabrini to respond effectively where fraud and corruption is suspected or identified.

Fraudulent or corrupt activity of any kind, including for the benefit of Cabrini, is expressly forbidden, and consequently, all cases will be investigated and dealt with as deemed appropriate. Cabrini staff are expected to conduct themselves in a manner consistent with the principles and values of Cabrini and those expressed within the Code of Conduct, 'Our Promise'.

1.2 Purpose

The purpose of this document is to formalise and communicate Cabrini's Fraud and Corruption Control Plan for preventing, detecting and responding to fraud and corruption.

This plan applies to all Cabrini employees, consultants, contractors, sub-contractors, casual staff, volunteers, board members and audit and risk management committee members.

Cabrini is committed to a structured approach to fraud and corruption control that meets recognised standards (where appropriate), such as *Standards Australia AS8001-2008 Fraud and Corruption Control* and as reflected in this plan.

This Fraud and Corruption Control Plan documents Cabrini's organisational approach to managing fraud and corruption exposure at a strategic and operational level. It details Cabrini's intended actions in implementing and monitoring fraud and corruption prevention, detection and response initiatives.

This plan is an integral part of Cabrini's overall risk management approach on the premise that fraud and corruption are business risks that are managed by the application of risk management principles.

The measures described in this Plan have been designed to:

- Help ensure Cabrini adequately fulfils its responsibilities;
- Enhance the protection afforded to Cabrini's assets, interests and reputation in order to help eliminate internally and externally instigated fraud and corruption against Cabrini;
- Detect instances of fraud and corruption against Cabrini in the event that preventative strategies fail;
- Establish a coordinated approach for the investigation of suspected or alleged fraud and corruption that supports the recovery of property dishonestly appropriated (or compensation equivalent to any loss suffered as a result of fraudulent or corrupt conduct); and
- Safeguard the reputation of individuals involved in the process.

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1.3 Definitions

'Fraud' is the crime of obtaining financial or another benefit by deception. While there is no single accepted definition of fraud, the Australian Standard for fraud and corruption control defines fraud as:

'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'.

Fraud can be perpetrated by employees, stakeholders, contractors and external service providers, acting alone or in collusion.

There are many different types of fraud. Examples include:

- Regulatory (e.g. inappropriately influencing a decision or turning a blind eye to illegal behaviour);
- Financial (e.g. payments to fictitious suppliers or employees or exaggerating the value of goods delivered or services provided or deception relating to annual and sick leave);
- Theft of tangible assets (e.g. removal of medical equipment or loss of inventory); and
- Theft of intangible assets (e.g. intellectual property or other confidential information).

'Corruption' is defined by the Australian Standard for fraud and corruption control as:

'Dishonest activity in which a director, executive, manager, employee or contractor of an entity acts contrary to the interests of the entity and abuses their position of trust in order to achieve some personal gain or advantage for themselves or for another person or entity.'

'Whistleblowing' for the purposes of this plan is defined as the disclosure by a witness of actual or suspected wrongdoing in an organisation that reveals fraud, corruption, or other serious wrongdoing.

A **'Whistleblower'** is a person who reports serious wrongdoing in accordance with this plan.

1.4 Code of Conduct

The purpose of Cabrini's Code of Conduct – *'Our Promise'* - is to promote adherence to the values prescribed of compassion, integrity, courage and respect for all. In particular, Cabrini employees are required through the code of conduct to demonstrate:

- **Integrity** – *We remain true to our beliefs at all times, our mission and values are non-negotiable.*
- **Integrity** – *We are honest and reliable, making decisions that are consistent with our mission and taking responsibility for our own actions.*
- **Courage** - *We maintain the courage of our convictions and express our values through our actions.*
- **Respect** - *We respect ourselves, our colleagues and the excellence of the services we deliver.*

All persons undertaking work for Cabrini, whether in a paid or unpaid capacity, are required to adhere to the principles set out in the Code of Conduct.

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1.5 Roles and accountabilities for fraud and corruption control

To help ensure that Cabrini's fraud and corruption risk management program is effective, it is important to understand the roles and responsibilities that personnel at all levels of Cabrini have with respect to fraud and corruption risk management.

All levels of management are accountable for setting the appropriate tone of intolerance for fraudulent and corrupt acts by displaying the proper attitude toward complying with laws, rules, regulations and policies. In addition, all staff should be cognisant of the risks and exposures inherent in their area of responsibility, and should establish and maintain proper internal controls that will provide for the security and accountability of the resources entrusted to them. Specific responsibilities of management and staff are detailed below:

1.5.1 Audit and Risk Management Committee

- Oversight of risk management arrangements and systems of internal control addressing fraud and corruption risk;
- Oversight of the performance and leadership of the internal and external audit functions, including their impact on fraud and corruption risk;
- Oversight of Cabrini's compliance with applicable legal and regulatory requirements, including those relating to fraud and corruption;
- To assist Cabrini to assess the processes for determining and managing Cabrini's key risk areas, including fraud and corruption risk; and
- To provide advice on whether management has in place a current and appropriate risk management framework and associated procedures for the effective identification and management of organisational risks, including fraud and corruption risk.

1.5.2 Chief Executive Officer (CEO)

- Ensuring effective systems and adequate resources are in place in relation to prevention of fraud and corruption;
- Ensuring fraud and corruption prevention is embedded in the broader risk management approach;
- Providing leadership and demonstrating commitment to ethical behavior and preferred culture; and,
- Ensuring the staff conduct is consistent with the code of conduct.

1.5.3 Fraud and Corruption Control Officer

- Developing and maintaining the fraud and corruption control plan;
- Assessing whether the fraud and corruption controls per this plan are in place;
- Ensuring that the fraud and corruption control plan is current; and
- Delivery of training support and advice to Managers and personnel identified as working in high risk areas.

1.5.4 Integrity Governance Officers

- Receiving both confidential and identifiable Whistleblower reports;
- Appointing a suitable Integrity Protection Officer and putting them in contact with the Whistleblower to support them;

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- Where required, coordinating the investigation of the report in conjunction with the Fraud and Corruption Control Officer; and
- Acting as the investigator, if this does not present a conflict of interest.

1.5.5 Integrity Protection Officer

- Providing protection to the Whistleblower according to Cabrini’s Whistleblowing Policy; and
- Keeping the Whistleblower informed of the progress and outcomes of the investigation subject to considerations of privacy of those against whom the allegations have been made.

1.5.6 Director of Finance

- Ensuring appropriate financial management controls are established and maintained to prevent and detect fraud and corruption, including establishment and maintenance of an effective fraud and corruption detection program over financial aspects;
- Through financial training as appropriate, raise the awareness of management to fraud and corruption prevention and detection; and
- Notifying the Integrity Governance Officer of possible instances of finance related fraud and corruption.

1.5.7 People Services

- Providing training and advice to staff to help ensure staff are aware of their responsibilities in relation to the Fraud and Corruption Control Plan;
- Ensuring processes are in place for the leadership team to address unsatisfactory behaviour;
- Ensures that any disciplinary action taken against staff with respect to fraud or corruption is in line with Cabrini’s industrial relations instruments; and
- Assisting the Integrity Protection Officer in managing the welfare of Whistleblowers as requested.

1.5.8 Directors

- Providing governance and oversight over their respective directorate to help prevent and detect acts of misconduct, fraud and corruption;
- Informing subordinate staff of their responsibility for fraud and corruption prevention and detection and helping educate staff in this regard; and
- Promote staff awareness of ethical principles subscribed to by Cabrini, including an appropriate attitude towards compliance with laws, rules and regulations.

1.5.9 All Staff and Contractors

All staff are required to understand and discharge their responsibilities in relation to fraud and corruption, including:

- Being aware of common indicators and symptoms of fraud, corruption or other wrongful acts and being vigilant and responding to indicators as appropriate;
- Cooperating with any fraud or corruption investigation and granting access to persons and documentation as required;

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- Complying with internal control requirements, policies and procedures;
- Safeguarding assets under their control; and
- Reporting suspected acts of fraud, corruption and misconduct as appropriate.

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2. Strategy

The following section details planning and resourcing undertaken to assist in the successful completion of activities related to fraud and corruption prevention, detection and response.

2.1 Appointment of a Fraud and Corruption Control Officer

The Executive Director People and Culture has been appointed Cabrini's Fraud and Corruption Control Officer.

The Fraud and Corruption Control Officer is required to have the capacity to understand and translate current best practice in fraud and corruption control into user-friendly practices and procedures in addition to delivering/coordinating training on relevant procedures, particularly to Cabrini's Executive Leadership Team. The Fraud and Corruption Control Officer is required to remain up to date with current best practice in fraud and corruption via:

- Training and attendance at relevant seminars, conferences and workshops;
- Maintaining a library of reference materials; and,
- Networking with other fraud and corruption control officers.

Cabrini's Fraud and Corruption Control Officer is responsible for ensuring that fraud and corruption control resources work together in a coordinated fashion in a way that achieves the objectives set out in this plan.

The Fraud and Corruption Control Officer will conduct a periodic review of the fraud and corruption control arrangements in consultation with the Audit and Risk Management Committee, and implement improvements as necessary.

2.2 Appointment of Whistleblower Officers

In accordance with Cabrini's Whistleblowing Policy, an Integrity Governance Officer and Integrity Protection Officer has been appointed.

Further information is provided in Cabrini's Whistleblowing Policy.

2.3 Other parties assisting and involved in fraud and corruption control

Other important resources and business areas necessary for controlling fraud and corruption include:

- Cabrini's legal advisers and staff;
- Finance;
- People and Culture Services;
- Compliance and quality assurance;
- Records management;
- Enterprise risk management; and
- Business Technology Services.

Cabrini's Fraud and Corruption Control Officer is responsible for ensuring that fraud and corruption control resources work together in a coordinated fashion in a way that achieves the objectives set out in this plan

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Additionally, all Cabrini staff are required to be involved in the prevention of fraudulent and corrupt conduct through reporting actual or suspected instances of fraud or corruption to the Whistleblower Governance Officer.

2.4 Internal audit activity

While primary responsibility for the identification of fraud and corruption within an entity rests with Cabrini staff, internal audit forms a key part of the overall control environment by identifying the indicators of fraud and corruption. Internal audit activity can be effective in the detection and prevention of fraud and corruption by helping to ensure adherence to internal control systems.

The internal auditor should have sufficient knowledge to identify the indicators of fraud and corruption but is not expected to have the expertise of a person whose primary responsibility is detecting and investigating fraud.

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3. Fraud and Corruption Control Plan - Prevention

The most effective deterrent of fraud and corruption is a well-informed workforce, prepared to disclose fraudulent and corrupt behaviour.

Fraud and corruption prevention mechanisms employed by Cabrini should comprise:

- **Documenting and communicating Cabrini’s stance** on fraud and corruption and its expectations around fraud and corruption management through this plan and Cabrini’s Integrity Framework.
- **Undertaking a Fraud Risk Assessment** to identify fraud and corruption risks within the organisation and implementing controls to minimise risks, e.g. segregation of duties, reconciliation etc.
- **Fraud and corruption management education** through a range of training and document dissemination programs to foster fraud and corruption awareness.
- **Strong control environment** through implementation of internal controls that are well documented, reviewed and updated regularly and understood by all Cabrini staff.

3.1 Implementing and maintaining an integrity framework

To help prevent fraud and corruption, an integrity framework has been developed using a participatory approach, which builds commitment from all employees and is subject to ongoing monitoring and maintenance. This includes the development and promulgation of the elements set out below.

Fraud and Corruption Control Plan

This plan documents the responsibilities for fraud and corruption prevention, detection and response initiatives required to be undertaken at Cabrini when any occurrence of fraud and corruption is suspected.

Example Setting

Example setting will be achieved through observable adherence to Cabrini’s integrity framework by Cabrini management and the Executive Leadership Team.

Codes of Behaviour

The Code of Conduct prescribes the behaviour expected of Cabrini employees.

Communications and Awareness

Periodic communications and fraud and corruption awareness training is conducted to help ensure staff are aware of their responsibilities in relation to fraud and corruption and have the knowledge and capability to deal with suspected instances.

Training

Specific training covering the code of conduct, ethical tools for decision-making and fraud and corruption awareness should be undertaken as part of the induction process. Where appropriate, periodic refresher sessions should be undertaken by all Cabrini staff.

Reinforcement

Ethical standards should be incorporated into Cabrini’s performance management and appraisal system.

Reporting of complaints

A mechanism for the communication of ethical concerns has been established, inside and outside the normal channels of communication.

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3.2 Executive Leadership Team commitment

Cabrini’s Executive Leadership Team are required to have, as a minimum, an understanding of the following fraud and corruption issues:

- The types of fraud and corruption common within the various industry sectors in which Cabrini operates and the losses typically associated with conduct of this type;
- The robustness of Cabrini’s internal control environment in terms of its ability to prevent and detect the types of fraud and corruption likely to occur, particularly in relation to their area of responsibility;
- A knowledge of the types of fraud and corruption that have been detected in Cabrini in the last five years and how those matters were dealt with in terms of disciplinary action and internal control enhancement; and
- Cabrini’s fraud and corruption prevention and control strategy.

A high level of risk consciousness for the risks of fraud and corruption is required to be present across the Executive Leadership Team, and if found to be absent, will be the subject of appropriate awareness training.

3.3 Maintaining a strong internal control system

Internal control is the first line of defence in the fight against fraud and corruption. All business processes at Cabrini are required to be subject to a rigorous system of internal controls that are well documented, updated regularly and understood by all personnel. This is particularly true for those processes which are assessed as having a higher predisposition to the risks of fraud and corruption.

The following elements of an internal control system are embedded to assist Cabrini in protecting itself against the risk of fraud and corruption:

- Internal controls that are appropriately documented, reviewed and amended regularly;
- Internal controls that are communicated effectively to all personnel appropriate to their level of responsibility and position description;
- A program for assessing compliance with Cabrini’s internal controls, through an internal audit program, as well as compliance monitoring by the Executive Leadership Team; and
- Executive management setting an example of internal control adherence.

Should a fraud or corruption be discovered and substantiated by appropriate investigation, the Fraud and Corruption Control Officer will conduct a review of the relevant controls associated with the fraud or corruption in consultation with the relevant Manager and other resources as required. The assessment will determine where the system of internal control broke down, and whether remedial action is necessary.

3.4 Fraud and corruption risk assessment

Fraud and corruption risk is systematically analysed and evaluated as part of Cabrini’s overall risk management process. As with the overall risk management process, fraud and corruption risk assessments will be conducted on an annual basis as part of the broader business planning process.

The overarching principle is an assessment of consequence and likelihood for each risk relative to other fraud and corruption risks and relative to other enterprise risks.

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The most important outcome of the fraud and corruption risk assessment process is the development of an effective anti-fraud and anti-corruption treatment program that specifically addresses the fraud and corruption risks faced by Cabrini. These measures are to be monitored for effectiveness over time.

3.5 Communication and awareness of fraud and corruption plan

Cabrini’s commitment to this plan is communicated to all external stakeholders through appropriate mechanisms (e.g. on Cabrini’s website).

Internally, regular communication is required to help ensure all Cabrini staff have a clear understanding of:

- The types of behaviour that constitute fraudulent or corrupt practice;
- The fraud and corruption detection measures that are in place; and
- The fraud and corruption control issues.

This should take place upon induction and as part of ongoing training initiatives and information sessions delivered throughout the course of employment. Additionally, the Fraud and Corruption Control Plan should be accessible to all staff on Cabrini’s intranet via PROMPT.

Staff awareness programs are developed and undertaken periodically by Cabrini to help ensure that all staff understand their role and responsibilities and that staff are aware of how to report potential fraud and corruption.

3.6 Employment screening

Cabrini conducts pre-employment screening for all new employees. Screening checks undertaken prior to employment of a permanent member of staff should include:

- Verification of identity (birth certificate, driver’s license);
- Police checks (for roles with access to finances or significant decision making authority or as required by regulation/legislation);
- At least two reference checks; and,
- Verification of formal qualifications claimed.

The People and Culture Services staff induction process requires that all new staff read and acknowledge the requirements of key Cabrini policies. These include:

- Code of Conduct;
- Cabrini Employee Handbook;
- Whistleblowing Policy and Procedures; and
- Conflict of Interest Policy (incorporating gifts, benefits and hospitality).

3.7 Taking of annual leave

One of the indicators in an organisation that fraud or corruption may be occurring is a reluctance to take regular and uninterrupted annual leave. To address this, and to support the health, safety and well-being of our staff, People and Culture Services policies should encourage staff to take regular annual leave.

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4. Fraud and Corruption Control Plan - Detection

Fraud and corruption detection programs comprise:

- **Encouragement of reporting** of suspected fraud and corruption from staff, stakeholders, suppliers and members of the public through confidential reporting mechanisms.
- **Conducting periodic reviews** of Cabrini's control environment, including ongoing review of risk register and delivery of internal audit program.
- **Established effective accounting and system controls** (including audit logging) that minimise the risk of fraud, and maximise the chances of early detection should it occur.

Cabrini's fraud and corruption detection program requires the implementation and ongoing refinement of systems to increase the likelihood of detecting fraud or corruption. Such procedures are implemented on a risk basis and may also help prevent fraud and corruption as the threat of detection may be enough to deter staff.

Cabrini have developed the following mechanisms to assist in detecting suspected fraud and corruption.

4.1 Post Transactional Review

Post transactional review procedures is undertaken by staff not involved in processing the transactions in question, with the objective of identifying altered or missing documentation, falsified or altered authorisation or inadequate documentation to support transactions or decisions.

4.2 Data mining

Cabrini's information systems are an important source of information on fraudulent and, to a lesser extent, corrupt conduct. As with post transactional review, data mining is undertaken by a staff member independent of the data being examined, with the objective of identifying exceptions which may indicate fraudulent and / or corrupt conduct. For example, periodic comparison of employee bank account details to bank account details maintained in the accounts payable masterfile may identify misappropriation of funds.

4.3 Analysis of management accounting reports to identify trends

Trends identified are examined and those which may be indicative of fraudulent or corrupt conduct should be further investigated. For example monthly actual/budget comparison reports for individual cost centres, reports comparing expenditure against industry benchmarks and reports highlighting unusual trends in bad or doubtful debts or write-off's.

4.4 Mechanisms for reporting suspected fraud and corruption incidents

All actual or suspected instances of fraud or corruption are required to be reported through one or more of the following internal reporting lines:

Cabrini's Whistleblower Governance Officer

Whistleblower reports of actual or suspected instances of fraud or corruption or detrimental action by Cabrini or its employees is made to Cabrini's Whistleblower Governance Officer, through the contact details provided in Cabrini's Whistleblowing Policy.

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The Integrity Governance Officer will respond to these reports as per Cabrini’s Whistleblowing Policy, in conjunction with Fraud and Corruption Control Officer and where deemed appropriate, confidentially communicate results of completed investigations to the Audit and Risk Management Committee, CEO and the Executive Director of the affected area.

4.5 Implementing a Whistleblower protection program

Procedures have been established for the protection of people (including Cabrini staff, committee members and members of the public) who make disclosures that reveal conduct that is fraudulent and/or corrupt.

Refer to Cabrini’s [Whistleblowing Policy](#) for additional information.

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5. Fraud and Corruption Control Plan - Response

Cabrini have developed the following mechanisms for responding to suspected fraud or corruption.

5.1 Investigation

Cabrini's Integrity Governance Officer is responsible for appointing an investigator and overseeing, coordinating and informing the Fraud and Corruption Control Officer of the progress of the investigation.

The investigation into apparent or suspected fraud and corruption is required to be conducted by appropriately skilled and experienced persons who are independent of the business unit in which the alleged fraudulent or corrupt conduct occurred.

The Integrity Governance Officer may engage external resources to assist in the investigation if deemed necessary.

Investigations are to be conducted in accordance with the following requirements:

- External parties engaged to assist in investigations on Cabrini's behalf should be required to enter into a binding agreement in relation to the release of confidential information coming into their possession during the course of the investigation;
- Any investigation and resulting disciplinary proceedings is required to be conducted in an atmosphere of transparency at all times ensuring that the rules of natural justice are observed;
- The overall guiding principles of any investigation into alleged improper conduct are independent and objective;
- An investigation should comply with all relevant legislation in the jurisdiction in which action will or could be initiated;
- Adequate records are to be made and kept of all investigations. These records should be kept in accordance with legal, best practice or privacy management guidelines; and
- All information arising from, or relevant to, the investigation is not to be disseminated to any person not required by their position description to receive the information.

Any investigation into improper conduct within Cabrini should be subject to an appropriate level of supervision by Cabrini's CEO and the Audit and Risk Management Committee, having regard to the seriousness of the matter under investigation and adherence to Cabrini's Privacy Policy.

5.2 Reporting and escalation

All actual or suspected instances of fraud or corruption are required to be reported to Cabrini's Whistleblower Governance Officer. The Integrity Governance Officer is responsible for escalating matters to relevant internal and external parties as deemed appropriate.

Cabrini has established a Fraud and Corruption Incident Register. Maintenance of the register is the responsibility of the Fraud and Corruption Control Officer. The following information is required to be captured in relation to every reportable fraud and corruption incident:

- Date and time of report;
- Date and time that incident was detected;

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- How the incident came to the attention of management (e.g. anonymous report, normal report, supplier report);
- The nature of the incident;
- Value of loss (if any) to Cabrini; and,
- The action taken following discovery of the incident.

The Integrity Governance Officer is responsible for reporting instances of fraud and/or corruption to the authorities where appropriate and other relevant law enforcement agencies.

5.3 Disciplinary procedures

All disciplinary proceedings are required to be undertaken in accordance with established policies and procedures, the purpose of which is to:

- Deal appropriately with grievances;
- Encourage reasonable, fair and respectful treatment for all employees;
- Ensure decision-making in employment related workplace issues is equitable, consistent, open and transparent, and is based on the merit principle where applicable;
- Ensure our people are aware of the procedures and appropriate avenues for applying for review of a decision or action;
- Put processes in place to ensure decisions/actions can be reviewed impartially, confidentially and efficiently and with a view to reaching resolution internally where possible;
- Ensure we can meet our legislative and industrial responsibilities; and
- Support our commitment to ensuring fair, equitable, transparent and reasonable treatment for our people, clients, stakeholders and the community.

5.4 Internal control review following discovery of fraud or corruption

In each instance where fraud and/or corruption is detected, the Fraud and Corruption Control Officer and relevant employee should assess the adequacy of the internal control environment and consider whether improvements are required.

Where improvements are required, these are to be implemented as soon as practicable. A summary of recommendations or requirements for the modification of the internal control environment are to be provided to the relevant employee.

The Fraud and Corruption Control Officer and relevant employee are required to reassess the control environment subsequent to the implementation of additional controls to determine whether the level of risk has been reduced to an acceptable level.

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6. Key legislation, standards and other documents

This document has a close relationship with the following:

Legislation

- *Corporations Act 2001 (Cth)*
- *ASIC Act 2001 (Cth)*

Standards

- Australian Standard on Fraud Control and Corruption Control (AS 8001: 2008);
- AS/NZS/ISO 31000:2009, Risk Management Principles and Guidelines;
- SA/SNZ HB 436:2013 (Guidelines to AS/NZS ISO 31000:2009);
- AS 8000:2003, Good Governance Principles; and
- HB 254:2005, Governance, Risk Management and Control Assurance.

Related Cabrini Materials

- [Whistleblowing Policy](#)

7. Document control

Executive Sponsor:	(Acting) Chief Financial Officer	
Content Approved By:	Cabrini Health Executive – Mission and Strategy Committee	Date: 9 th November 2016
Authorised to Publish By:	(Acting) Chief Financial Officer	Date: 12 th May 2017