VGCCC Integrity Framework 2023

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# Introduction

## Legal and Regulatory Environment

There are a number of statutory requirements related to integrity (fraud and corruption) which are detailed in Appendix 1. In summary:

* ***Public Administration Act 2004*** requires the VGCCC to promote public sector values, have controls to prevent fraud and requirements for Commissioners around conflict of interest, code of conduct and gifts.
* **VPS Code of Conduct** requires VGCCC employees to report behaviours that represent corrupt conduct.
* **Standing Directions 2018 under the** ***Financial Management Act 1994* (Directions*)*** requires a control system and a policy to be in place to manage fraud, corruption and other losses, for records to be kept of suspected and confirmed instances and for adherence to reporting requirements.
* ***Public Interest Disclosures Act 2012*** requires procedures for the management of public interest disclosures.

## Purpose

The purpose of the Integrity Framework, the (Framework) is to provide an integrated governance approach to control the risks of fraud and corruption by protecting VGCCC integrity and exposing and preventing misconduct, corruption, fraud and theft by implementing best practice controls.

The Framework provides an expanded description of the VGCCC Fraud and Corruption Control System (FCCS) which is summarised in the Fraud, Corruption and Other Losses Policy (FCOL Policy).

## Definitions

The following definitions apply for purposes of this Framework.

**Misconduct** under the *Public Administration Act 2004* (PA Act) (section 4) includes:

* contravention of the PA Act or Code of Conduct for Victorian Public Sector Employees and the Directors Code of Conduct
* improper conduct in an official capacity
* contravention of a lawful direction given to an employee
* employees making improper use of their position for personal gain
* employees making improper use of information gained because of their position.

When misconduct becomes serious in nature it becomes corruption.

**Corrupt conduct** under the *Independent Broad-based Anti-Corruption Act* (IBAC Act) (section 4) is defined as conduct, or an attempt or conspiracy to engage in conduct that:

* adversely affects the honest performance of the functions of a public officer or public body
* constitutes or involves the dishonest performance of the functions of a public officer or public body
* constitutes or involves knowingly or recklessly breaching public trust
* involves the misuse of information or material acquired in the course of the performance of the functions of a public officer or public body
* is intended to adversely affect the effective performance of the functions or powers of a public officer or public body and results in the person or their associate obtaining a specified benefit.

In order for conduct to be corrupt conduct, it must also constitute a relevant offence. A relevant offence may be:

* an indictable offence against the IBAC Act
* bribery of a public official
* perverting (or attempting) to pervert the course of justice
* misconduct in public office.

**Fraud[[1]](#footnote-1)** is dishonest activity causing actual or potential gain or loss to any person or organisation including theft of monies or other property by persons internal and/or external to the organisation and/or where deception is used at the time, immediately before or immediately following the activity.

# Integrity Framework Overview

The Integrity Framework is summarised in Figure 1. It is based on the objectives for misconduct resistance promulgated by the Western Australian Corruption and Crime Commission[[2]](#footnote-2). The programmes are consistent with the Australian Standard *AS 8001-2021 Fraud and Corruption Control*.

Figure 1 Integrity Framework Overview

Accountability & Management commitment

Prevention

Recruitment

Suppliers

Stakeholder & Community awareness

Internal controls

The VGCCC operations are conducted transparently and at the highest standard of accountability, integrity and probity and in the public interest.

Objectives

Programs

Goal

**CULTURE**

VGCCC culture generates its own high standards, norms and internal controls.

**OPERATIONAL STRATEGIES**

Factors that encourage or allow behaviour that damages integrity are mitigated.

**MANAGEMENT ENVIRONMENT**

Corruption and fraud resistance is an integrated and established component of operations.

Ethical standards

Policy framework

Employee awareness

Cultural Support

Risk management

Oversight

Detection

Response

Ethical compliance

#  Culture

**Objective:** ***VGCCC culture generates its own high standards, norms and internal controls.***

## Ethical Standards

The standards that employees are expected to uphold are defined in codes of conduct and the VGCCC values statement.

* **Victorian Public Sector (VPS) Code of Conduct** The *Public Administration Act 2004* (PA Act) and the VPS Code of Conduct articulates public sector values. It is the responsibility of all VGCCC employees to ensure that their conduct demonstrates responsiveness, integrity, impartiality, accountability, respect, leadership and commitment to human rights.
* **Director’s Code of Conduct** Commissioners are bound by the Director’s Code of Conduct**[[3]](#footnote-3)** which is aligned to the public sector values and by the Disclosure of interest guidelines which are required under section 21 of the VGCCC Act 2011**[[4]](#footnote-4)**.
* **VGCCC values** The VGCCC has articulated its values as ‘*work together’* ‘*act with integrity’* *‘respect other people’*, ‘*make it happen’* and ‘*act with courage and confidence’*. Compliance with VGCCC values and behaviours is embedded in Performance Development Plan (PDP) reviews. Employees’ performance is reviewed biannually against the values.
* **VGCCC conduct and ethics** The VGCCC needs to also uphold VGCCC-specific conduct requirements for doing business in the industries it regulates. The VGCCC Conduct and Ethics Policy outlines the standard of behaviour expected of all employees and promotes adherence to public sector values.

## Policy Framework

VGCCC has a comprehensive policy platform to provide a solid foundation to support the culture of integrity and to communicate the VGCCC’s commitment, values and business practices including:

* **Conflict of Interest** All employees performing VGCCC duties are required to act in good faith towards the VGCCC. The Conflict of Interest Guidelines and Procedures detail the process for declaring and managing conflicts of interest. Staff must disclose actual or potential conflicts of interest to their manager and stand down in any decision-making process where they may be compromised. A confidential register is kept. All employees declare conflicts of interest annually including a declaration where there is none. Commissioners are subject to specific declaration of interest requirements and Directors make an annual full disclosure of private interests.
* **Gifts, Benefits and Hospitality** VGCCC has established and regularly reviews policies and processes to respond to offers and provision of gifts, benefits and hospitality (GBH). Processes are consistent with the Gifts, Benefits and Hospitality Policy Framework issued by the Victorian Public Sector Commission. Awareness and compliance are established through a communication programme which reinforces that a breach could constitute a breach of binding codes of conduct and result in disciplinary action. The recording of hospitality expenditure is compliant with government financial requirements.

A register of offers of gifts, benefits and hospitality offered is kept. VGCCC reports annually to the Audit and Risk Management Committee (ARMC) on the administration and quality control of its GBH processes and register. The report includes an analysis of the VGCCC’s GBH risks, risk mitigation measures and any proposed improvements. VGCCC publishes its GBH policy and register on its website with the published register covering the previous and current financial year.

* **Outside Employment** The Conduct and Ethics Policy manages conflict of interests and outside employment. Outside employment is not permitted where the work arises from or associated with employee's official duties unless it is in the interests of the VGCCC (example - some lecturing activities). Employees who, in the course of their official duties, have access to information not available to the public are not permitted to engage in any outside employment to which this information might be used. Permission must be obtained prior to engaging in outside employment. A register is kept and there is a process of annual renewal of permissions.
* **Authorised Persons** Some VGCCC employees are subject to statutory restraints on their activities whilst and post being a ‘*restricted person’*. A restricted person means all VGCCC Commissioners, Inspectors, and all VGCCC employees appointed by the Commission to be Authorised Persons under s 1.3(3) of the *Gambling Regulations Act 2003*. The authorised persons policy sets out the procedure for appointing and revoking the appointments of Inspectors and authorised persons under the *Victorian Gambling and Casino Control Act 2011,* and includes details of the restrictions that apply to authorised persons during and post-employment, and their related entitlements.
* **Social Media for Employees** This policy provides guidance to employees and external contractors for their professional and personal use of social media.

Policies and processes for recruitment and merit selection of employees are addressed in section 4.3.1. Policies and mechanisms addressing inappropriate behaviours are described in section 5.4.

## Employee Awareness

To provide a strategic approach to employee awareness and to strengthen compliance by employees, the People and Culture Team (P&C) develop and roll out communications informed by the annual People Matter Survey.

Integrity related e-learning is delivered on the VGCCC Nexus Learning Management System (LMS). All compulsory learning and development programmes are monitored for implementation by P&C and reported to divisional Directors.

The programmes are reviewed on a three-year cycle to ensure they meet business needs unless there are changes in the operating or regulatory environment or significant changes in the risk profile. The suite of
e-learning was refreshed in 2022.

All e-learning is mandatory as part of the new starter induction process. The programmes include:

* **Corruption and Fraud** The content of this e-learning includes expected behaviours, the definition of fraud and corruption, the consequences of such activity, controls in place and reporting responsibilities. It is rolled out annually.
* **Code of Conduct** This e-learning applies to all employees. The content includes the importance of, responsibilities, identifying and applying the VPS Code of Conduct and responding to a breach.
* **VGCCC respect in the workplace** This e-learning content includes expected conduct of a VGCCC employee, responding to unacceptable behaviour and the support available.

Periodically face-to-face learning on culture and integrity related issues is rolled out.

## Cultural Support

There are a number of support activities to a workplace culture that encourage staff to accept personal responsibility for behaving according to VGCCC values and in the public interest.

* **People Matter Survey** The surveyis conducted annually by the VPSC across the whole of the Victorian government. It allows employees to provide feedback to their organisation about perceptions of workplace culture and employee experiences. This information is used by the VGCCC in the measurement and improvement of organisational culture and action plans arise from the annual survey.
* **Benchmarking** Indicator/s in the People Matter Survey of staff perceptions on integrity issues are used as performance measures, benchmarked against similar organisations, to identify improvement over time.
* **IMPACT (Purpose and Culture Activation Team)** The core purpose of the team is to improve the workplace culture by collaborating with management and staff to support a working environment whereby staff feel engaged, motivated and appreciated.

## Ethical Compliance

Employees must complete the VPS Code of Conduct e-learning module and a conflict of interest and outside employment declarations on commencement with the VGCCC. Employees also declare that they have read and understand various policies including Conduct and Ethics and Gifts, Benefits and Hospitality.

# Operational Strategies

**Objective: *Factors that encourage or allow misconduct, corruption and fraud are identified and treated.***

## Risk Management

Corruption, fraud and other losses risks (integrity risks) identification and assessment are part of the wider VGCCC Corporate Risk Management Framework which is consistent with *ISO 31000: Risk Management – Guidelines* and the Victorian Government Risk Management Framework.

An integrated organisational wide approach is used to manage the integrity risk profile through the Integrity, Compliance and Risk Forum (the Forum).

High and very high risks are escalated to the Executive through the strategic risk register until treated. The reporting and review cycle requires the Forum to review the risk profile biannually and the Executive Management Team, ARMC and the Commission receive a summary annual report.

The Forum in the biannual integrity risk review also considers and if required addresses reports issued by IBAC and provides a report to the Executive.

## Internal Controls

There are clear and documented procedures for those conducting activities that may be vulnerable to misconduct.

* The **VGCCC Procurement and Contract Management Framework** is based on high standards of probity and is consistent with the VictorianGovernment Purchasing Board (VGPB) principles and guidelines. There is an automated procure to pay and contract management modules within the financial system, an Internal Purchasing Unit and as a mandated agency use of State Purchase Contracts and the Whole of Victorian Government Panels or Registers established by the VGPB.
* The **VGCCC Financial Management Framework** is consistent with the *Financial Management Act 1994* and the Standing Directions 2018. It documents roles and responsibilities, governance, service delivery and compliance/reporting.
* The **VGCCC Information Security Management Framework (ISMF)** is based on compliance with the 12 high level mandatory standards of the Victorian Protective Data Security Standards (VPDSS) and the 91 applicable controls (elements) within. VGCCC develops a Protective Data Security Plan (PDSP) biennially which it submits to the Office of the Victorian Information Commission (OVIC). The CEO attests annually that the VGCCC has or is in the process of implementing the VPDSS and has conducted a Security Risk Profile Assessment (SRPA). Assurance is provided annually by Internal Audit.
* There is **segregation of duties** for a number of functions including the purchasing and the accounts payable function and the payroll preparation and payroll authorisation function.

Internal Audits, which are undertaken according to the three-year Strategic Internal Audit Plan (SIAP), provide assurance on the operations of internal controls.

## Prevention

Prevention measures are commensurate with the level and nature of risk identified in the integrity risk profile and include recruitment, suppliers, regulated entity awareness and the Fraud, Corruption and Other Losses Policy.

### Recruitment

* **Recruitment** The VGCCC aims to recruit and select the best possible applicants for positions at all levels ensuring transparency and consistency with the merit and equity employment principles in the *Public Administration Act 2004*. The **Recruitment Selection and Vacancy Policy** adopts the merit in employment principle under the VPSC guidelines. If a member of the selection panel has direct, personal interest or involvement they must declare any financial, family or other close personal relationship with any applicant for the position. The VGCCC is in the process of developing a **Gender Equality Action Plan** (GEAP) that outlines our commitment to promoting gender equality practices and reducing gender inequality. The GEAP incorporates actions and activities to ensure recruitment and best practice promotion, a workforce gender balance and pay equality.
* **Pre-employment screening** is conducted andincludes employment, qualifications and reference checks. Prospective employees must undergo a National Police Record Check (NPRC) and/or fingerprints and palm prints. More stringent and specific requirements regarding criminal history checks apply in relation to recruitment to a position as an ‘Authorised Person’ whether an internal or external applicant (refer section 3.2). Psychometric testing is required for selected positions.
* **New starter induction** To ensure that new employees understand the VGCCC managers/supervisors are required to complete the New Starter Checklist with new employees. Managers/supervisors should hold discussions with new employees as part of the induction process on key areas including IT users’ policy and records management as well as mandatory e-learning (refer section 3.3). Compliance to these requirements is monitored.
* **Protected information declarations** New employees, contractors and agency staffsign declarations about complying to protected information requirements under section 10.1.30 of the *Gambling Regulation Act 2003.*

### Regulated entity awareness

* Regulated entity awareness is provided to stakeholders and the community through the publishing of governance information on the VGCCC website.The Governance section of the VGCCC Website addresses and provides information on corporate governance frameworks. This includes the VGCCC Integrity Framework, Corporate Governance Framework, VGCCC Charter, VGCCC values, VPS Code of Conduct, Public Interest Disclosures, Conflict of Interest Guidelines and the Gifts, Benefits and Hospitality Policy.

### Suppliers

* **Supplier vetting and contracts** Suppliers are vetted duringthe procurement process. All suppliers agree to the standard terms and conditions prior to the delivery of services particularly to ensure confidentiality and privacy of information and alignment to the VGCCC values and behaviours.

### Fraud

* **Fraud, Corruption and Other Losses Policy** articulates VGCCC’s commitment to a culture of integrity and the control of fraud, corruption and other losses. It details responsibilities, internal and external reporting requirements and investigation and recovery processes. It should be considered in conjunction with the VGCCC Integrity Framework.
* **Fraud Training** All new employees undertake fraud e-learning and refresher training is conducted annually.

# Management Environment

**Objective: *Misconduct, corruption and fraud resistance and response is an integrated and established component of VGCCC operations.***

## Corporate Oversight

Misconduct, corruption and fraud resistance has high level ownership and corporate oversight.The Director Corporate Services is the owner of the Integrity Framework and is responsible for the coordination of integrity related compliance and risk management across the VGCCC in consultation with the Integrity Compliance and Risk Forum. The Forum comprises the Director Legal, Policy and Harm Minimisation & General Counsel, Director Corporate Services, Chief Finance Officer, Chief Information Officer, Deputy CEO & Executive Director Regulatory Operations and People and Culture Manager.

## Accountability and Management Commitment

* **Line management accountability** is embedded as ethics and misconduct, corruption and fraud prevention goals are included in the performance measures against which managers are evaluated and are used to determine progression. Supervision capability is managed and assessed though the PDP process and the Learning and Development Programme.
* **Delegations** are detailed in instruments and registers and are easily accessible by staff via the intranet. There is a searchable data base for statutory delegations. VGCCC Instruments of Delegations are reviewed annually. Delegations training is provided through the induction process by the Manager. Higher duties processes include identification of delegations and training:
	+ The Commission exercises its powers under its establishing legislation, through delegations of some functions to a single Commissioner, a group of Commissioners or to various positions within the organisation. Powers are delegated to levels based on risk assessments.
	+ The VGCCC Chair, under delegation from the Minister for Casino, Gaming and Liquor Regulation, makes financial delegations allowing the CEO, Director Corporate Services, Chief Finance Officer and other nominated positions to authorise expenditure. A Financial Authorisation Policy outlines the accountabilities for VGCCC staff in exercising their delegated financial authorities.
	+ The VGCCC Chair, who has employment powers conferred on them by enabling legislation, makes employment delegations to positions within the organisation.
* **Accountability** is defined in the VGCCC organisational structure with clear reporting lines, position descriptions detail supervisory responsibilities and performance is assessed in reviews through the PDP process. Supervision training is periodically addressed through the Learning and Development Programme.
* **Standard Operating Procedures** articulate work processes and include comprehensive recording of work activities, random checks by supervisors, staff rotation of roles and the separation of regulatory scheduling from regulatory performance activities.

## Detection

Ongoing corruption, fraud and other losses monitoring programmes are encompassed into existing internal control and assurance programmes.

* **Internal Processes** VGCCC utilises internal processes including post month end analysis, audit logs, reporting and reconciliations to manage the financial risk of corruption and fraud**.**
* **External Audit** The Victorian Auditor-General’s Office (VAGO) conducts an annual audit to provide assurance that the VGCCC’s annual financial statements are free from material misstatement due to fraud or error. Control weaknesses are identified during the audit.
* **Internal Audit** The VGCCChas an independentaudit function which:
	+ conducts internal audits in accordance with fraud detection, prevention and response provisions of the Professional Practices Framework of the Institute of Internal Auditors
	+ examines and evaluates the adequacy and effectiveness of the system of internal controls relating to areas of focus in the Strategic Internal Audit Plan (SIAP)
	+ provides independent advice to management on control issues with implementation of agreed recommendations monitored by the ARMC.

## Response

The VGCCC investigates all instances of suspected incidents and takes appropriate action including referral to Victoria Police and/or disciplinary action. All investigators (whether internal or external) are required to be suitably qualified with the investigation to be conducted consistently with the Independent Broad-based Anti-corruption Commission’s (IBAC) “*Reference Guide: Managing an internal investigation into misconduct (2021)”.* Other documents that address elements of incident response include:

* **Corruption and fraud response** is incorporated into the Fraud, Corruption and Other Losses Policy
* **Misconduct processes** There are performance management processes including policies for misconduct and unsatisfactory work performance and grievance/review of action.
* **Public interest disclosure procedures** detail how those who report corruption through IBAC are managed.

# Related documents

* Code of Conduct for Victorian public sector employees
* VGCCC Conduct and Ethics Policy (including Outside Employment Guidelines)
* Conflict of Interest Policy
* Gifts, Benefits and Hospitality Policy
* Social Media for Employee’s Policy
* Authorised Persons Policy
* Financial Authorisations Policy
* VPSC Misconduct Policy
* VPSC Management of Underperformance Policy
* VPSC Grievance Policy
* Recruitment, Selection and Vacancy Policy
* Public Interest Disclosure Procedures
* Gender Equality Action Plan (under development)
* The Victorian Charter of Human Rights and Responsibilities Act 2006

# Appendix 1 Integrity Compliance Register

| **INTEGRITY COMPLIANCE REGISTER**  |
| --- |
| **REFERENCE** | **REQUIREMENTS** |
| ***Public Administration Act 2004*** |
| **S. 72(4)** | A [public sector body Head](http://www.austlii.edu.au/au/legis/vic/consol_act/paa2004230/s4.html#public_sector_body_head) must promote the [public sector values](http://www.austlii.edu.au/au/legis/vic/consol_act/paa2004230/s4.html#public_sector_values) to [public officials](http://www.austlii.edu.au/au/legis/vic/consol_act/paa2004230/s4.html#public_official) employed in the body and ensure that any statement of values adopted or applied by the body is consistent with the [public sector values](http://www.austlii.edu.au/au/legis/vic/consol_act/paa2004230/s4.html#public_sector_values) |
| **S 62 (4)** | A public sector body Head must ensure that persons employed in the body are informed about the application of the public sector employment principles and standards |
| **S. 81(1)(e)** | The board of a public entity must - ensure that a code of conduct applicable to directors is in place |
| **S. 81(1)(f)** | The board of a public entity must - ensure that processes are in place to deal with conflicts of interests in [directors](http://www.austlii.edu.au/au/legis/vic/consol_act/paa2004230/s4.html#director) |
| **S. 81(1)(g)** | Ensure that an adequate gifts policy for directors is in place |
| **S. 81(1)(j)**  | The board of a public entity must - ensure that adequate controls are in place to prevent fraudulent behaviour |
| **VPS Code of Conduct** |
| **Clause 3.6** | Public sector employees must report to an appropriate authority workplace behaviour that represents corrupt conduct |
| **2018 Standing Directions of the Minister for Finance under the *Financial Management Act 1994*** |
| **S. 3.5.1** | The Responsible Body must take all reasonable steps to minimise and manage the risk of Fraud, Corruption and Other Losses and establish a Fraud, Corruption and Other Losses prevention and management policy that is implemented across the Agency |
| **S 3.5 Instruction**  | The Policy must outline the Agency’s system for the prevention, management and tolerance of Fraud, Corruption and Other Losses Provide a control environment to mitigate the risks and to identify and manage incidentsInclude processes for the investigation of and a process for recording actual and suspected incidencesInclude a defined value threshold above which an actual or suspected Fraud, Corruption or Other Losses is considered significant |
| **S3.5.2** | The Accountable Officer must keep records of all actual and suspected incidences including remedial actions planned and taken and on request provide the Responsible Minister, Portfolio Department or Audit Committee with a copy of records kept |
| **S3.5.3** | Where an agency is made aware of an actual or suspected Significant or Systematic Fraud Corruption and Other Losses notify the Responsible Minister, Audit Committee, Portfolio Department and Auditor General of the incident and remedial action to be taken, keep them informed including the outcome of investigations and take action to mitigate against further incidents. |
| ***Audit Act 1994*** |
| **S.10(1)** | The financial statements of each public body must be audited by the Auditor-General from time to time and at least once in each year. |
| ***Public Interest Disclosures Act 2012*** |
| **S 58 [5]** | A public body must establish procedures for the protection of persons from detrimental action in contravention of section 45 taken by the public body or members, officers or employees of the public body. |
| **S 59 [2]** | The procedures must be consistent with— (a) this Act; and (b) the regulations made under this Act. |
| **S 59 [3]** | The procedures, other than the procedures established by the Victorian Inspectorate, must be consistent with the guidelines issued by the IBAC under section 57. |
| **S 59 [4]** | An entity required to establish procedures under section 58 must ensure those procedures are readily available to the public |

# Document Details

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| V1.1 | 16/02/23 | Updated to include the CIO as a member of the ICRF  | Governance Manager |
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1. Australian Standard AS 8001:2021 Fraud and Corruption Control, notes to this definition:

Note 1 to definition: Property in this context also includes intellectual property and other intangibles such as information.

Note 2 to definition: fraud 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.

Note 3 to definition: While conduct must be dishonest for it to meet the definition of “fraud” the conduct need note necessarily represent a breach of the criminal law.

Note 4 to definition: The concept of fraud within the meaning of this Standard can involve fraudulent conduct by internal and/or external parties targeting the organisation or fraudulent or corrupt conduct by the organisation itself targeting external parties. [↑](#footnote-ref-1)
2. Misconduct Resistance – An integrated governance approach to protecting agency integrity, Corruption and Crime Commission [CCC], Western Australia 2008 [↑](#footnote-ref-2)
3. Code of Conduct for Directors of Victorian Public Entities, Victorian Public Sector Commission [↑](#footnote-ref-3)
4. *Victorian Gambling and Casino Control Commission Act 2011* [↑](#footnote-ref-4)