Australian Government
Department of Employment and Workplace Relations

Fraud and Corruption Control Strategy

2026-2028

Contents

Secretary Statement

The mission of the Department of Employment and Workplace Relations (the department) is to support job opportunities and strengthen workplaces. The department contributes to better outcomes for people, communities, employers and the Australian economy. In delivering our role, the department administers significant public resources, exercises important decision-making responsibilities, and holds sensitive information. This requires the highest standards of integrity and stewardship of public trust.

Fraud and corruption undermine public confidence, divert resources from the public good, and damage the integrity of government. This Fraud and Corruption Control Strategy sets out how the department prevents, detects and responds to fraud and corruption, consistent with the Public Governance, Performance and Accountability Rule 2014 and the Commonwealth Fraud and Corruption Control Framework. It reinforces integrity as the foundation of our systems, decisions and behaviours across policy development, program delivery, procurement and partnerships.

Upholding integrity is a shared responsibility. Every person working for, or on behalf of, the department must act ethically, manage risk and report suspected fraud or corruption. By doing so, we protect the public interest and maintain confidence in the services we deliver for Australians.

Simon Duggan

Secretary

29 June 2026

Introduction

Integrity is at the foundation of the department's systems, decisions and behaviours across policy development, program delivery, procurement and partnerships. The department does not tolerate dishonest, fraudulent or corrupt behaviour. This means the department will take all reasonable measures to prevent, detect and respond to fraud and corruption relating to the department and will:

- promote awareness of fraud, corruption and integrity to its workers
- assess and, where appropriate, investigate all allegations of fraud and corruption
- seek to recover losses through proceeds of crime and administrative recovery processes and
- take appropriate criminal, civil, administrative, or disciplinary action, including prosecution and termination of employment or contracts.

Definitions

Fraud

Fraud is defined in the Commonwealth Fraud and Corruption Control Framework as 'dishonestly obtaining (including attempting to obtain) a gain or benefit, or causing a loss or risk of loss, by deception or other means'. The conduct does not need to represent a breach of criminal law. A benefit or loss is not restricted to a material benefit or loss and may be tangible or intangible. A benefit may also be obtained by a third party.

Internal fraud

Internal Fraud is a form of corruption that is committed by departmental workers[1] and can include:

- falsely claiming employee entitlements
- unauthorised access, modification, theft, or disclosure of information
- misdirection or theft of department funds or
- use or theft of department assets for personal or third-party benefit.

External fraud

External fraud is that committed by parties external to the department such as service providers, recipients of the department's services or members of the public[2] and can include:

- submitting false information to receive subsidies, payments, services, or other benefits
- applying for loans or other support payments using false or stolen identities
- unauthorised access, modification, theft, or disclosure of information
- deliberately omitting information when interacting with the department's programs or
- submitting false invoices or invoices for work not completed.

Corruption

Corruption is defined in the Commonwealth Fraud and Corruption Control Framework, consistent with the *National Anti-Corruption Commission Act 2022* (NACC Act), as 'any conduct that does or could compromise the integrity, accountability, or probity of public administration'. Corruption may be criminal or non-criminal in nature and may affect any aspect of public administration. This includes:

[1] Consistent with the Commonwealth Fraud and Corruption Control Framework Glossary definition of internal fraud

[2] Consistent with the Commonwealth Fraud and Corruption Control Framework Glossary definition of external fraud

- Any conduct of any person (whether or not a staff member of a Commonwealth agency[3]) that adversely affects, or that could adversely affect, either directly or indirectly
    - the honest or impartial exercise of any staff member's powers as a staff member of a Commonwealth agency or
    - the honest or impartial performance of any public official's functions or duties as a public official.
- Any conduct of a staff member of a Commonwealth agency that constitutes or involves a breach of public trust.
- Any conduct of a staff member of a Commonwealth agency that constitutes, involves, or is engaged in for the purpose of abuse of the person's office.
- Any conduct of a staff member of a Commonwealth agency, or a former staff member of a Commonwealth agency, that constitutes or involves the misuse of information, or documents acquired in the person's capacity as a staff member of a Commonwealth agency.

It is not necessary for a public official or another person to gain a benefit for their conduct to be considered serious corrupt conduct.[4]

The following examples list behaviour that may amount to corruption:

- collusion between APS staff and a potential contractor
- bribery (domestic or foreign)
- obtaining, offering, or soliciting secret commissions, kickbacks, or gratuities
- one or more individuals manipulating a procurement process for personal gain
- nepotism, or preferential treatment of family members
- cronyism, or preferential treatment of friends and associates
- intentionally concealing, or not declaring, a conflict of interest
- unlawful disclosure of official or commercially sensitive information
- insider trading, or misusing official information to gain an unfair private, commercial or market advantage for self or others.

Non-compliance

Non-compliance is any failure to meet obligations under applicable laws, regulations, agreements, contracts, or other requirements[5]. This includes intentional, reckless, negligent and unintentional acts.

As fraud or corruption typically require intent, actions resulting from carelessness, accident or error are generally considered non-compliance. Non-compliance can evolve into sharp practice (behaviour that is not illegal but is morally or ethically wrong) or fraud and corruption, especially when deception is involved. Effective management of non-compliance is an essential element of controlling fraud and corruption risks.

Misconduct

Misconduct is conduct by an APS employee that fails to meet expectations of the **APS conduct framework** as set out in the Australian *Public Service Act 1999*, or conduct by an external workforce[6] worker in breach of the Commonwealth Supplier Code of Conduct.

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[3] A staff member of a Commonwealth Agency has the same meaning in relation to the entity as defined in the NACC Act 2022 and includes APS staff, contractors, and contracted service providers.

[4] Consistent with outcomes from the NACC's investigation into the Robodebt Royal Commission referral - Operation Myrtleford

[5] Consistent with the Commonwealth Fraud and Corruption Control Framework Glossary definition of Non-compliance

[6] External workforce as defined in the APSC Strategic Commissioning Framework and includes workers procured through labour hire, contracting and consulting arrangements.

The conduct framework describes the behaviour expected of APS employees which includes acting with honesty, diligence, avoiding conflicts of interest, and ensuring the proper use of information. The department has established procedures for assessing, investigating and responding to suspected misconduct, including potential breaches of the APS Values or Code of Conduct.

All instances of fraud or corruption committed by the department's workers are considered misconduct. The department responds effectively and proportionately to suspected misconduct with the aim to prevent recurrence and uphold or restore public confidence in the department. A response to fraud and corruption may include action under the APS conduct framework in addition to other administrative, civil or criminal responses where appropriate.

Governance

Fraud and Corruption Control Framework

The department's Fraud and Corruption Control Framework is consistent with the Commonwealth Fraud and Corruption Control Framework. It includes governance, risk management, policies and procedures and is implemented with the Prevent, Detect, Respond model.

Key Roles and Responsibilities

Role	Responsibility
Secretary	As the Accountable Authority under the *Public Governance, Performance and Accountability Act 2013* (PGPA Act), the Secretary is responsible for taking all reasonable measures to prevent, detect and respond to fraud and corruption relating to the department. The Secretary must refer suspected serious or systemic corrupt conduct by current or former departmental officials to the NACC, an obligation that has been delegated to the Chief Operating Officer under Instrument No. D23-015.
Chief Operating Officer	Delegate for referrals of suspected serious or systemic corrupt conduct by current or former departmental officials to the NACC.
Chief Security Officer	Provides strategic oversight and management of security across the department.
Chief Information Security Officers	Responsible for establishing and maintaining the department's cyber security program, ensuring protection of core and external-facing ICT systems in accordance with the ISM and PSPF.
Chief Risk Officer	Ensures the department's enterprise risk management approach (strategic and operational) facilitates the efficient and effective governance of significant risks, including fraud and corruption.
Deputy Secretaries	Provide oversight of fraud and corruption management in their Group and ensure effective application of all reasonable fraud and corruption controls.
First Assistant Secretaries	Oversee the assessment and management of fraud and corruption risks relevant to their Division including prevention, detection, and response where appropriate. Ensure detailed fraud and corruption risk assessments for functions within their Division are conducted in accordance with the department's Fraud and Corruption Control Policy.

Role	Responsibility
	Ensure fraud and corruption risks shared across agencies or business functions are understood and appropriately managed.
Assistant Secretaries	Oversee management of fraud and corruption risks for their Branch including ensuring that fraud and corruption risks are understood and appropriately documented and controlled.
Audit and Risk Committee (ARC)	Consistent with section 17 of the PGPA Rule, provides independent advice to the Accountable Authority about financial reporting, performance reporting, system of risk oversight and management, and systems of internal control. This includes the risk oversight and management of systems in place to manage the department's fraud and corruption risks.
Enterprise Risk, Assurance and Investigations Branch	Responsible for coordinating the department's implementation of the Commonwealth Fraud and Corruption Control Framework.
People Branch	Responsible for providing advice and support regarding application of the APS conduct framework, conducting code of conduct investigations, and referring misconduct that could be considered corruption to Enterprise Risk, Assurance and Investigations Branch.
Finance Branch	Responsible for the department's Procurement, Gifts and Benefits, and Travel and Credit Card policies, monitors and reports identified financial non-compliance, and manages the annual Management Assurance Certificate issued to SES and annual Credit Card Assurance Certificate issued to all credit card holders.
Finance and Governance Committee	A Tier 2 committee responsible for overseeing and advising on the department's financial management, governance, and risk settings to ensure strong stewardship, compliance, and effective risk management, including fraud and corruption risk.
Public Interest Disclosure Officers	As per the *Public Interest Disclosure Act 2013*, must refer suspected serious or systemic corrupt conduct involving current or former departmental officials to the NACC.
Managers / Contract Managers	Foster a culture of integrity in their business areas together with the implementation and operation of governance arrangements including: • ensuring fraud and corruption risks are considered when planning and conducting business • ensuring staff understand and comply with relevant legislation, regulations, procedures, and policies • assisting relevant officials to conduct fraud and corruption control activities, including risk assessments • monitoring and assessing the ongoing suitability of external workforce under their contracts, and collaborating with the IT Security Team to ensure appropriate system access and security clearances are applied and maintained.

Role	Responsibility
Public officials, including APS employees, external workforce (contractors, consultants and labour hire) and third-party service providers	Act with honesty and integrity and comply with legislated and policy requirements. Report all suspected instances of fraud or corruption. Cooperate with the department and NACC as public officials.
Recipients of the department's services, payments, or assistance	Provide the department and its service providers accurate and timely information. Report all suspected instances of fraud or corruption.

Fraud and Corruption Reporting

Reporting and monitoring provide assurance regarding the effectiveness of the department's control arrangements to prevent, detect and respond to fraud and corruption. The department collects information on allegations of fraud and corruption against the department, current and completed investigations and the outcome of the assessment or investigation. The department's reporting, assurance and monitoring controls include:

Fraud certification and annual report

Each year, the Secretary certifies in the annual report whether the department has met the requirements of the Fraud and Corruption Rule, in accordance with section 17AG of the PGPA Rule. The ARC is provided with this certification analysis for visibility and awareness that the Secretary has met their fraud and corruption obligations as the Accountable Authority.

Reporting to governance committees

The department's key fraud and corruption control initiatives, integrity initiatives and investigation updates are regularly reported to the ARC, Executive Board and its subcommittees, as appropriate.

Annual reporting to the Australian Institute of Criminology

Per the Commonwealth Fraud and Corruption Control Framework, the department collects data on risks and instances of fraud and corruption and reports this information annually to the Australian Institute of Criminology.

Biennial NACC Integrity Survey

The NACC Integrity Survey gathers anonymised feedback from Commonwealth public sector employees about their perceptions and experiences of integrity and corruption, helping the NACC and agencies identify trends, risks and areas for improvement in integrity systems and culture. The department takes part in the survey to support transparency and accountability, to better understand its own integrity risks, and to use the results to strengthen corruption prevention, education and continuous improvement across the department in line with whole-of-government integrity expectations.

Enterprise Fraud and Corruption Risks

The department conducts an Enterprise Fraud and Corruption Risk Assessment at least every 2 years, in accordance with the Commonwealth Fraud and Corruption Control Framework. The department's enterprise fraud and corruption risks are as follows:

Information

Official business information is any information created, sent, or received in the course of the work delivered for the department. The department handles large volumes of official business information that is personal, sensitive, security classified or otherwise requires protection. Official business information is an attractive target for acts of fraud or corruption and can attract motivated and sophisticated external parties, including organised crime.

The department also receives a large volume of information that informs decisions relevant to fraud and corruption targets. This includes information relevant to awarding and continuing contracts; promotions and entitlements; entry to programs; or approval of loans, payments, subsidies or grants. This makes the department vulnerable to receiving false information.

Risk events include theft, misuse, unauthorised access, destruction, concealment, modification or disclosure of intellectual property or official business information.

The department needs to be on the lookout for receiving and acting on false information.

Finance

The department is responsible for management of a multi-billion-dollar budget, which presents an attractive target for potential acts of fraud or corruption. The department's operations involve payments and procurements, including those regarding salaries, contracts, grants, loans and subsidies.

Possible risk events include theft, misuse or misdirection of payroll, entitlements, cash, credit cards, reimbursements, invoices, revenue, grants, subsidies and loans.

Outcomes of decisions

The department and its workers are responsible for decisions that result in benefits, including non-financial benefit. These can include decisions to allow entry into a program, those regarding loan forgiveness or decisions about the application of compliance responses.

Possible risk events include misuse of power or position, conflicts of interest, acting on inducement such as bribery or coercion and making decisions with dishonest intent which may or may not cause benefit or loss.

People

The department is staffed by highly trusted workers, with opportunities to commit or be a party to acts of fraud or corruption. Workers also have the potential for conflicting interests. While a conflict of interest is not inherently corrupt, failure to identify and manage conflicts appropriately can expose the department to increased corruption risk. The appropriate management of conflict of interest also applies to financial and outcomes of decisions risks.

Possible risk events include bias in recruitment processes, undeclared or mismanaged conflicts of interests, outside employment and inducements being provided to decision-makers to influence outcomes.

Assets and systems

The department owns and is responsible for a range of assets including ICT equipment and systems, vehicles, furniture and facilities. These assets can have monetary value if sold and have personal or intrinsic value if stolen or misused and are common targets for acts of fraud or corruption.

Possible risk events include theft, damage or misuse of any department-controlled assets, including IT systems, facilities, vehicles, equipment, and other tangible, intangible or physical assets.

Fraud and Corruption Controls

Prevent

Fraud and corruption prevention initiatives focus on establishing and maintaining sound governance systems, systems of control and an ethical organisational culture. Prevention strategies are the most effective way to mitigate fraud and corruption and operate by reducing the likelihood and consequence of fraud and corruption events. The department's prevention strategies include:

- fraud and corruption, security, and integrity awareness training
- conflict of interest management, including declarations and guidance
- a robust system of internal controls implemented at the program, policy, business function and project levels
- a comprehensive information security framework
- fraud and corruption risk management integrated into enterprise risk management arrangements
- implementing the Protective Security Policy Framework and workforce screening controls.

Detect

Effective systems are necessary to detect fraud and corruption quickly to minimise impact. Measures to detect fraud and corruption within the department include:

- fraud and corruption reporting channels including email, phone and anonymous options
- availability of Authorised Officers under the Public Interest Disclosure Scheme
- detective controls implemented at the business level, including compliance programs and data analytics
- an integrity dashboard that provides a single, transparent view of integrated data to support trend and anomaly monitoring, and early intervention
- participation in the Fraud Fusion Taskforce
- an annual program of internal audits.

Respond

Response controls aim to disrupt, discontinue and recover from fraudulent or corrupt activity and provide general deterrence. Response strategies include:

- fraud and corruption allegation assessment and investigation
- prosecution where sufficient evidence is available
- recovery of losses via civil, criminal, or administrative processes and
- post incident reports to address known vulnerabilities.

Reporting Suspected Fraud and Corruption

Department of Employment and Workplace Relations

You can report suspected fraud or corruption to the department's Fraud and Integrity Team by:

- Email: fraud@dewr.gov.au
- Phone: (02) 6240 8888
- Online: Whispli (anonymous reporting tool) - https://dewr-gov-au.whispli.com/reportfraud
- Post: Fraud and Integrity Team
  PO Box 9828
  Canberra ACT 2601

Please provide as much information as possible, however do not investigate the matter yourself.

If possible, include the following information:

- Who is involved? Include the name/s of the person/s or organisation/s, address/es and phone number/s.

- What fraud or corruption do you think has occurred? Including how, when and where it occurred.
- If you believe the behaviour or issue is continuing.
- How you came to know about the matter.

Where possible, please provide supporting documentation. You do not need to provide your contact details; however, it can assist the department to assess and investigate the allegation.

If you are unsure whether an activity constitutes fraud or corruption, please contact the Fraud and Integrity Team for advice.

Fair Entitlements Guarantee

You can also report Fair Entitlements Guarantee related fraud directly to the Fair Entitlements Guarantee Branch via the Reporting FEG related fraud website.

National Anti-Corruption Commission (NACC)

The department refers all cases of suspected serious or systemic corruption to the NACC, and complies with requests from the NACC, in accordance with the *NACC Act 2022*.

The NACC considers most people who work for, exercise the powers of, or perform functions for, the Australian Government or the Australian Parliament as public officials for the purpose of investigating corruption. This includes consultants, independent contractors and labour-hire contractors directly engaged by the department. It also includes external service providers and third-party providers who are required to adhere to all contractual and/or legal obligations, program guidelines or conditions of funding that govern their relationship with the department. A failure to comply with these obligations may constitute corruption or fraud.

Anyone can report serious or systemic corruption directly to the NACC. Information on how to submit reports directly, including protections that exist for those who make referrals or act as witnesses, is available via the NACC website.

Public Interest Disclosure

The *Public Interest Disclosure Act 2013* seeks to promote integrity and accountability by:

- encouraging the disclosure of information about alleged serious wrongdoing
- protecting those who make such disclosures and
- ensuring that disclosures are properly actioned.

The department will act on disclosures as appropriate, and protect disclosers from any reprisals for making a disclosure. A person must be a current or former public official, including staff of third party contracted service providers, to report under the Public Interest Disclosure scheme.

To make a Public Interest Disclosure a person can:

- email PID@dewr.gov.au. This can include requesting contact directly from a departmental Authorised Officer or
- disclose to their supervisor.

Further information on public interest disclosures at the department can be found on the Department's website.

Privacy

To enable the department to investigate reports of suspected wrongdoing, fraud, or corruption, the department may be required to collect personal information of people who have made these reports.

Personal information is handled in a manner compliant with the *Privacy Act 1988* and the Australian Privacy Principles.

For more information about how the department handles personal information (including information on accessing or correcting your personal information) and how to make a privacy complaint, please view the department's Complete Privacy Policy. The department's Complete Privacy Policy can be accessed in alternative formats (eg. hard copy) by submitting a request to privacy@dewr.gov.au.

Further Information

For further information about this document, the Fraud and Corruption Control Framework, PID or Integrity matters contact Integrity@dewr.gov.au

For information about reporting suspected fraud and corruption, fraud intelligence and investigations contact Fraud@dewr.gov.au

For further information see:

Commonwealth Fraud and Corruption Control Framework 2024

DEWR Privacy Policy

Australian Government Investigations Standards

APS Values and Code of Conduct in Practice

Public Governance, Performance and Accountability Act 2013 (PGPA Act)

PGPA Rule 2014

Privacy Act 1988

Public Interest Disclosure Act 2013

Proceeds of Crime Act 2002

Public Service Act 1999

Criminal Code Act 1995 (Commonwealth)

National Anti-Corruption Commission Act 2022

Protective Security Policy Framework

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