



Australian Government

Department of Foreign Affairs and Trade

DEPARTMENT OF FOREIGN AFFAIRS AND TRADE FRAUD AND CORRUPTION CONTROL FRAMEWORK

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Secretary's Message



I am pleased to present DFAT's *Fraud and Corruption Control Framework 2025* (the Framework).

Preventing, detecting, and responding to fraud and corruption is critical. Fraudulent and corrupt activity impedes our ability to deliver and shape the safe and prosperous world we want to live in. We must make ourselves alert to the possibility of fraud and corruption, to understand what these look like, and to understand our anti-fraud and corruption obligations. My expectations on our commitment to integrity in all its forms are in the *DFAT Integrity Strategy*, which I encourage you to read.

DFAT's *Fraud and Corruption Control Framework* has been updated to ensure we remain compliant with our legislative obligations as outlined in the *Fraud and Corruption Rule* (section 10 of the *Public Governance, Performance and Accountability 2014* [PGPA Rule 2014]), the *Fraud and Corruption Policy*, and the *Fraud and Corruption Guidance*.

The most effective defence against fraud and corruption is a workforce that: acts with integrity and in accordance with the values of the Australian Public Service; understands how to prevent, detect, and respond to fraud and corruption; and feels confident in doing so.

The National Anti-Corruption Commission (NACC) is an important part of the Australian Government's broader integrity landscape. The NACC is an independent Commonwealth agency responsible for preventing, detecting, investigating, and reporting on serious or systemic corrupt conduct in the Commonwealth public sector. DFAT is committed to supporting the NACC in mitigating the risk of corruption in the Commonwealth public sector, domestically and abroad.

DFAT has zero tolerance for inaction on fraud and corruption. You should familiarise yourself with this framework, for we all play a crucial role in the prevention, detection, and reporting of fraud and corruption.

Jan Adams AO PSM

Acknowledgement of Country

The Department of Foreign Affairs and Trade acknowledges the Traditional Owners and custodians of the lands on which we work, and we pay our respects to their Elders past, present, and emerging.

1. Introduction

The Australian Government is committed to building and embedding a strong integrity culture across the Australian Public Service. Integrity is one of the key drivers of public trust in government institutions and service delivery. As DFAT operates in complex and high-risk environments, we rely on all staff and delivery partners to report suspected fraudulent and corrupt behaviour. Fraud and corruption impede on DFAT's ability to deliver on its outcomes.

We have a range of legislative and policy obligations to manage the threat of fraud and corruption. Section 10 of the [PGPA Rule 2014](#) ensures that there is a minimum standard for accountable authorities. This is for Australian Government entities to prevent, detect and respond to fraud and corruption. We are also required to refer cases of potentially serious or systemic corrupt conduct to the National Anti-Corruption Commission (NACC).

The [Commonwealth Fraud and Corruption Control Framework 2024](#) introduces new obligations for Australian Government entities. This includes corruption risk and incident management, a stronger focus on governance and accountability arrangements, and elevating the periodic review of the effectiveness of fraud and corruption controls to a mandatory requirement.

1.1 Purpose

The DFAT *Fraud and Corruption Control Framework* ensures all DFAT staff and delivery partners understand their obligations to prevent, detect, and respond to fraud and corruption. It also outlines how to report suspected fraudulent or corrupt activity, and how DFAT's corporate governance manages the risks of fraud and corruption.

1.2 Scope

The Framework applies to all DFAT staff and delivery partners associated with the delivery of DFAT's services and outcomes, including:

- APS staff, including Senior Executive Service (SES) officers
- secondees to DFAT and staff from partner agencies at Post
- locally engaged staff (LES), including LES of other Commonwealth agencies at DFAT premises overseas
- statutory officers
- contracted service providers, such as consultants, independent contractors, and labour-hire contractors
- managing contractors (including their sub-contractors), grant partners (including their sub-grantees and subcontractors), and other delivery partners including multilateral and regional partners, when delivering goods or services for DFAT.

1.3 Our operating environment

DFAT operates in complex and challenging environments and engages with high levels of risk each day. This includes in countries that have varying systems of governance, accountability, and transparency.

This operating environment means we must engage with risk, including the risk of fraud and corruption, in an appropriate way. We must understand the risks and how these could impact the delivery of objectives. Also, how to engage in proportionate, transparent, and accountable actions to manage these risks.

DFAT is committed to a positive risk culture that fosters collaboration, encourages contestability, and values independent views. Our desired risk culture is shaped by the behaviours and attitudes of our leaders and staff. We want staff to foster leadership skills in risk management, including willingness to identify, actively manage and respond to risk, thereby mitigating threats and realising opportunities. We expect our leaders to exemplify this behaviour and foster it within teams.

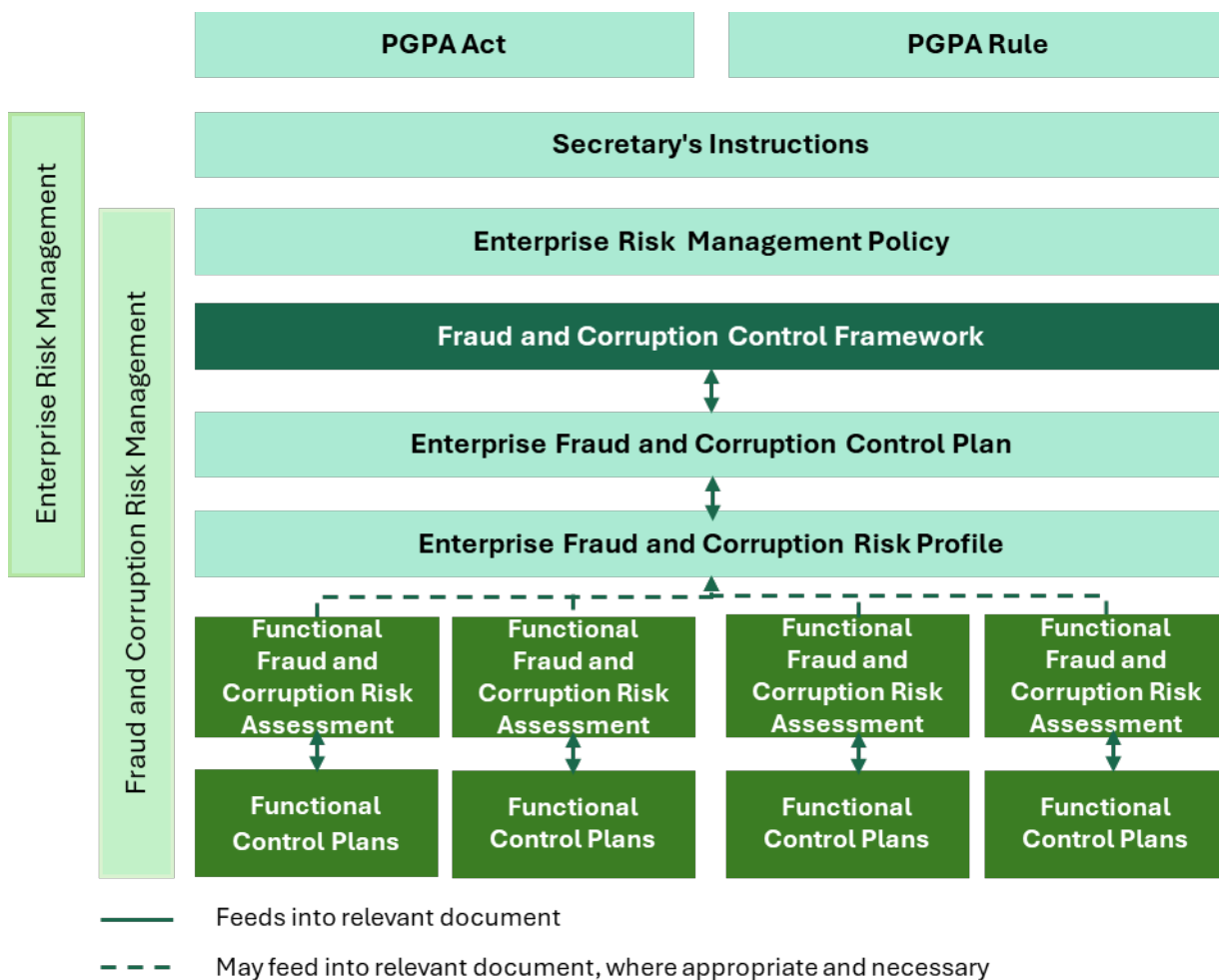
Key messages

- 🔑 DFAT operates in a complex, high-risk environment
- 🔑 Staff must take action when fraud and corruption is found
- 🔑 Staff must consider fraud and corruption in their work and take preventive action

2. Framework structure

The Framework assists DFAT staff and delivery partners to understand DFAT's fraud and corruption control arrangements (Figure 1). It also shows what our roles and responsibilities are when countering fraud and corruption.

Figure 1: DFAT's fraud and corruption risk governance.



2.1 Supporting documentation

The following documents support the Framework:

- **Enterprise Fraud and Corruption Risk Profile:** aggregated summary of fraud and corruption risks.
- **Enterprise Fraud and Corruption Control Plan:** outlines DFAT's strategy to manage fraud and corruption risks. This includes a continuous approach to monitoring and managing these risks through prevention and detection controls, as well as measures to respond to instances of fraud or corruption.
- **Functional Fraud and Corruption Risk Assessments and control plans:** record the fraud and corruption risks inherent to departmental functions, including how these are managed. Control plans detail existing preventative, detective, corrective controls, and, where relevant, the treatments to further mitigate risks.

- **Staff (internal) and Service Providers and Funding Recipients (external) Fraud and Corruption Control toolkits:** outlines internal and external responsibilities, and provide guidance on how to comply with relevant obligations for managing fraud and corruption risks.

Standard Operating Procedures and other related documents: are operational documents owned by business areas across DFAT. They provide further information on prevention, detection, and response activities. Examples of this include the [International Development Programming Guide](#) (notably Chapter 8—development risk management), and the [Due Diligence Framework](#).

2.2 Review of the Framework

The Counter Fraud and Anti-Corruption Section (FCS) reviews and updates the Framework regularly. This includes when there are substantial or emerging changes in the structure, activities, or functions of the department.

3. Policy settings

DFAT recognises that fraud and corruption against the department have a wide range of impacts. These can affect its internal operations and external diplomatic, trade and development assistance efforts. These impacts extend beyond financial loss and effect people, government outcomes and the environment. DFAT is committed to maintaining the highest integrity, transparency, and accountability standards in its operations.

DFAT proactively manages and responds to fraud and corruption risks through a range of prevention, detection, response, and continuous improvement measures. DFAT's leadership is committed to fostering a culture of integrity, in line with the department's *Integrity Strategy 2024–26*. This includes maintaining the capability and systems to ensure that all officials, delivery partners, and stakeholders actively contribute to minimising fraud and corruption.

3.1 Risk appetite and tolerance

DFAT acknowledges that we operate and seek objectives in an environment where fraud and corruption risks exist. In determining our risk appetite, we must ensure that fraud and corruption risks are understood, documented, and controlled to the extent possible, and that fraud risk management is escalated where necessary.

DFAT Fraud and Corruption Risk Tolerance

DFAT has **zero tolerance** for inaction on fraud and corruption. We take reasonable steps to prevent, detect, and respond to the incidents we become aware of.

DFAT Fraud and Corruption Policy Statement

DFAT will take all reasonable measures to prevent, detect, and respond to fraud and corruption relating to the department, including by:

- maintaining fraud and corruption risk assessments and promoting awareness of risks
- developing and implementing control plans to deal with fraud and corruption risks
- monitoring and reviewing the effectiveness of fraud and corruption controls
- maintaining governance arrangements to oversee and manage risks of fraud and corruption
- educating the workforce to build a culture of integrity
- requiring all DFAT staff and delivery partners to uphold their respective codes of conduct
- having appropriate mechanisms for the prevention and detection of fraud and corruption
- assessing and, where appropriate, investigating all allegations of fraud and corruption
- where appropriate, referring matters to relevant authorities. Pursuing appropriate civil or administrative remedies or prosecution. Seeking to recover losses where appropriate.

With **zero tolerance** for inaction on fraud and corruption, DFAT requires proactive reporting and transparency. We also have **zero tolerance** for reprisals against people who report wrongdoing.

4. Definitions

DFAT adopts the definitions of **fraud** and **corruption** as set out in [the *Commonwealth Fraud and Corruption Control Framework 2024*](#), and the [National Anti-Corruption Commission Act 2022](#) (NACC Act) respectively.

Regarding **foreign bribery**, DFAT adopts the meaning as derived in the [Criminal Code Act 1995](#) (Criminal Code).

4.1 Fraud

Fraud against the Commonwealth is defined as ‘dishonestly obtaining (including attempting to obtain) a gain or benefit, or causing a loss or risk of loss, by deception or other means.’ This definition is based on the dishonesty offences under the Criminal Code (chapter 7). However, 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.

Fraud against the Commonwealth may include (but is not limited to):

- theft of funds or property
- accounting fraud (for example, false invoices, misappropriation)
- misuse of Commonwealth credit cards and travel entitlements
- unlawful use of, or unlawful obtaining of, property, equipment, material, or services
- causing a loss or avoiding and/or creating a liability
- providing false or misleading information to the Commonwealth, or failing to provide information when there is an obligation to do so
- misuse of Commonwealth assets, equipment, or facilities
- cartel conduct
- making, or using, false, forged, or falsified documents; wrongfully using Commonwealth information or intellectual property
- misuse of information and business records.

Fraud requires intent. It requires more than carelessness, accident, or error. When intent cannot be shown, the matter may be pursued as non-compliance rather than fraud.

4.2 Corruption

Corruption is defined broadly consistently with the NACC Act. It is any conduct that does or could compromise the integrity, accountability, or probity of public administration. Pursuant to the NACC Act, this includes:

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

A public official can include:

- a staff member of a Commonwealth agency, which broadly includes an official as per the PGPA Act
- an individual who is employed or engaged in assisting the agency, or
- a contracted service provider under a Commonwealth contract.

Fraud and corruption often overlap as both involve dishonest or illegal behaviour to gain an unfair advantage or benefit, or cause loss. However, fraud involves deception to make a gain or cause a loss (for example, provision of false information to obtain a payment). Whereas corruption involves the abuse or misuse of power or position (for example, soliciting bribes, or nepotism). Therefore, corrupt conduct can include breaches of the code of conduct, as well as elements of both fraud and corruption.

4.3 Foreign Bribery

Foreign bribery is a subset of corruption. It involves providing, causing, offering to provide, or causing an offer of the provision of a benefit to a person with the intention of improperly influencing a foreign public official to obtain or retain business or a business or personal advantage.

Bribing or attempting to bribe a foreign public official is a serious crime. DFAT prohibits foreign bribery by its staff and delivery partners.

From September 2024, Australia introduced a new offence for corporations who fail to prevent their associates engaging in foreign bribery, marking a significant overhaul to enforcing anti-bribery measures. A key aspect of the amended laws is a corporate offence for 'failure to prevent foreign bribery.' Corporations operating overseas may be held criminally liable if any associate (including employees, agents, contractors, or subsidiaries) engages in foreign bribery and the corporation did not have 'adequate procedures' in place to prevent bribery. These changes will impact DFAT's delivery partners. DFAT has developed the *DFAT Fraud and Corruption Toolkit for Service Providers and Funding Recipients*, which contains information in relation to managing foreign bribery risks.

4.4 Other integrity matters

Figure 2 - Other integrity definitions, that are not covered by the Framework are:



5. Governance and Oversight

“Each of us play a crucial role in reducing DFAT’s exposure to fraud and corruption and have a duty to be aware of the potential for fraud and corruption and to report anything that we feel is not right.”

Secretary Jan Adams

DFAT has governance structures and processes to effectively oversee and manage fraud and corruption. These governance structures and processes are critical to effective decision-making, regular oversight, and assurance of the measures and mechanisms in place to manage fraud and corruption.

DFAT also expects delivery partners to maintain their own governance arrangements for the appropriate management of risks and incidents of fraud and corruption. Further guidance is provided in the *Fraud and Corruption Control Toolkit for Service Providers and Funding Recipients*.

5.1 Assurance

DFAT uses a three lines model to provide assurance on the department’s risk management processes, including those for fraud and corruption. The first line is business areas that own and manage risks associated with day-to-day operational activities. The second line puts in place support, checks, and challenges to provide assurance the first line is managing risks effectively. It also assists the first line through targeted tools and training. The third line provides independent review outside an organisations management structure. All three lines work together to ensure effective risk management.

Within DFAT, the three lines are:

- First-line - Own and manage risks associated with day-to-day operational activities. This includes DFAT’s divisions, posts, state, and territory offices (STOs) and Australian Passport Office (APO) STOs who are accountable for assessing and managing risks.
- Second-line - Establish and maintain enterprise risk policy. This includes DFAT’s Executive Division (Enterprise Risk Management Section) and risk policy areas that monitor and advise on risk management policies, systems, and processes. For fraud and corruption, second line areas include FCS, Ethics, Integrity, and Professional Standards Section (EES) and Passports Fraud and Integrity Section (PFS).
- Third-line - Independent monitoring and assurance. This includes DFAT’s Internal Audit Branch provides independent assurance to the Secretary on how effectively DFAT is assessing and managing its risks. Including assurance on the effectiveness of first line and second line activities.

5.2 Roles and Responsibilities

Table 2 below clearly defines the responsibilities for all DFAT staff and delivery partners in relation to managing fraud and corruption risks and events. It is crucial that all DFAT staff and delivery partners understand these responsibilities. This ensures that DFAT remains proactive, accountable, resilient, and compliant with its legislated responsibilities. Understanding of individual and organisational responsibilities enables:

- enhanced accountability and clarity of decision-making, owing to clear ownership of responsibilities
- mature risk management with greater focus on effective controls and proactive risk mitigation
- improved collaboration and communication through clarity of reporting lines
- increased efficiency through better understood processes and resource optimisation
- fostering a culture of integrity by promoting ethical behaviour and accountability.

All DFAT staff and delivery partners are required to familiarise themselves with their specific responsibilities and obligations. This is set out in Table 2 below, with the applicable legislative and policy framework. DFAT related roles and responsibilities, where relevant, align with those described in the *Enterprise Risk Management Policy*.

The roles and responsibilities are:

Secretary

- as the Accountable Authority under the PGPA Act, ultimately responsible for compliance with obligations under the *Fraud and Corruption Rule*. This includes establishing and maintaining effective controls for the prevention, detection and response
- set the ethical direction of DFAT by establishing a strong culture of integrity and accountability.

Chief Operating Officer

- oversees the implementation of fraud and corruption prevention and control for DFAT in line with the PGPA Act. This includes reporting to the Secretary on risks, control effectiveness and related matters
- oversees internal governance mechanisms related to preventing, detecting, and responding to fraud and corruption relating to DFAT staff, services or third parties who interact with the department.

Chief Risk Officer (FAS EXD)

- responsible for the policy and governance for managing risk. Provides advisory role to the Secretary and Executive in understanding DFAT's capability to manage risk in line with its risk profile
- oversees the implementation of this Framework
- oversees enterprise risk reporting procedures and raising awareness.

Executive Board and other governance committee members

- provide leadership, risk oversight and strategic direction on fraud and corruption issues.

Audit and Risk Committee

- provides independent advice and assurance to the Secretary on the effectiveness of DFAT's fraud and corruption controls.

All SES officers

- maintain an ethical organisational culture based on the PGPA Act, APS Act, APS Values, Codes of Conduct, Employment Principles
- oversee fraud and corruption risks and controls and related governance mechanisms in their work areas.
- always act ethically
- support DFAT's Integrity Strategy 2024–26 and risk management efforts
- ensure no reprisals against reporting officers.

Internal Audit Branch

- provide independent assurance to the Secretary on how effectively the department is assessing and managing its risks, including assurance on the effectiveness of first line and second line activities.

Counter Fraud and Anti-Corruption Section, Executive Division

- responsible for DFAT's Fraud and Corruption Control Plan and this Framework
- manages all external fraud relating to DFAT, other than passport fraud.

Passports Fraud and Integrity Section (PFS), Australian Passport Office

- responsible for all aspects of fraud, corruption and non-compliance relating to Australian passports or passport Issuance Systems.

Ethics, Integrity, and Professional Standards Section (EES), People Division

- responsible for receiving and, where appropriate, investigating allegations of misconduct (including fraud and corruption) by DFAT APS and LES staff.

Transnational Crime Section (TNC), International Security Division

- responsible for reporting information that could reasonably be suspected to relate to serious extraterritorial offence under Australian law to the Australian Federal Police or appropriate law enforcement, including foreign bribery.

Public Interest Disclosure (PID) Authorised Officers

- responsible for receiving reports of disclosable conduct and have a range of decision-making, notification and other responsibilities under the [Public Interest Disclosure Act 2013](#) (PID Act)
- responsible for referrals to the NACC where the conduct concerns a person who is, or was, a staff member and where it is suspected the issue could involve 'serious or systemic' corruption.

All APS and LES staff, all secondees, staff from partner agencies at Post, all statutory officers, consultants, independent and/or labour-hire contractors

- comply with DFAT's fraud and corruption control policies and procedures, including completion of mandatory training. Further guidance is provided in the [DFAT Fraud and Corruption Control Toolkit for Staff](#)
- report suspected fraudulent, corrupt, or improper conduct through the appropriate channels
- act ethically and support DFAT's Integrity Strategy 2024–26 and risk management efforts.

External Contractors (including their sub-contractors), grant partners (including sub-grantees and sub-contractors), other delivery partners (including multilateral and regional partners) that deliver goods or services for DFAT

- understand what constitutes fraud and corruption and what to do if they suspect fraudulent and corrupt activity
- abide by all agreement obligations. This includes having appropriate fraud and corruption controls in place; reporting all relevant fraud and corruption through to the relevant area, and investigating fraud and corruption matters unless otherwise directed by DFAT or the NACC. Further guidance is provided in the [DFAT Fraud and Corruption Control Toolkit for Services Providers and Funding Recipients](#)
- ensure no reprisals against reporting officers.

5.3 Executive and regulatory compliance oversight

DFAT undertakes regular reporting and provides assurance on the appropriateness of control arrangements to prevent, detect, and respond to fraud and corruption. This includes:

- regular reporting to executives, governance committees and Audit and Risk Committee (ARC) on fraud and corruption risks including matters on control effectiveness
- informing the Foreign Minister about the activities of, and significant issues that may affect, DFAT. This may include initiatives undertaken or planned, significant fraud or corruption risks, significant fraud or corruption incidents and responses, and/or referrals to other entities like the Australian Federal Police (AFP), the NACC, or the Commonwealth Director of Public Prosecutions (CDPP)
- informing the Finance and Foreign Ministers about any significant non-compliance with finance law
- report in the DFAT Annual Report on compliance with the *Commonwealth Fraud and Corruption Rule*, and the Secretary's certification that the department has appropriate mechanisms for preventing, detecting incidents of, investigating, or otherwise dealing with, and recording or reporting, fraud and corruption
- statutory reporting to the Australian Institute of Criminology (AIC) to participate in the AIC's annual report on fraud and corruption relating to Commonwealth entities
- reporting to the Commonwealth Ombudsman in relation to PIDs under the PID Act.

DFAT evaluates control effectiveness, including after receiving, assessing, and investigating suspected fraud and corruption incidents. It collaborates with relevant business areas to address any gaps or vulnerabilities, maintaining oversight and reporting at the operational level, and escalating when necessary.

6. Fraud and Corruption Risk Assessments

DFAT established an Enterprise Fraud and Corruption Risk Profile (EFCR Profile). This summarises the department's exposure to, and management of, fraud and corruption risks. The EFCR Profile is supported through an Enterprise Fraud and Corruption Risk Register, and a Fraud and Corruption Control/Treatment Catalogue. The EFCR is supported by decentralised risk registers, screening and management maintained by business areas.

7. Fraud and Corruption Control Plans

Control plans help DFAT to document, communicate, manage, and monitor treatment decisions and activities to mitigate our identified fraud and corruption risks.

DFAT's *Enterprise Fraud and Corruption Control Plan* includes key enterprise-level controls and treatment strategies, for preventing, detecting, responding, and reporting on fraud and corruption. The enterprise-level control plan provides further information for internal stakeholders beyond that described in the Framework. Relevant functions must develop and maintain fraud and corruption control plans as appropriate.

8. Control effectiveness

Control effectiveness describes how well a control is reducing or managing the risk. The more effective controls are, the greater assurance it provides that the associated risks are being managed. Assessment of control effectiveness can occur through either 'first line' functions during operational activities or 'second line' and 'third line' functions undertaking assurance activities.

9. Fraud and Corruption Control

9.1 Prevention and detection

To protect DFAT from the impact of fraud and corruption risks, the department has an established internal control environment. This is aligned to the International Public Sector Fraud Forum's fraud and corruption principles outline "prevention is the most effective way to address fraud and corruption," "there is no one solution," and "finding fraud and corruption is a good thing."

Prevention measures are the first line and the most cost-effective method of controlling fraud and corruption. DFAT has in place measures designed to detect internal and external fraud and corruption as soon as possible.

Further detail of enterprise-level controls and treatment strategies are in the *Enterprise Fraud and Corruption Control Plan*. All DFAT staff are encouraged to familiarise themselves with targeted control plans for business area's activities, functions, and programs.

Culture of Integrity

A key element of effective fraud and corruption control is a strong, proactive culture of integrity. This not only reduces the likelihood of fraud and corruption but also strengthens DFAT's foundation for success. DFAT recognises the benefits of a strong ethical organisational culture and strives to achieve this in every aspect. Crucially, all staff, including SES officers, LES, and contracted service providers must understand and carry out their roles in upholding these values in every aspect of their work.

9.2 Response

DFAT has established measures for responding to potential fraudulent or corrupt behaviour reported to or detected by the department, including:

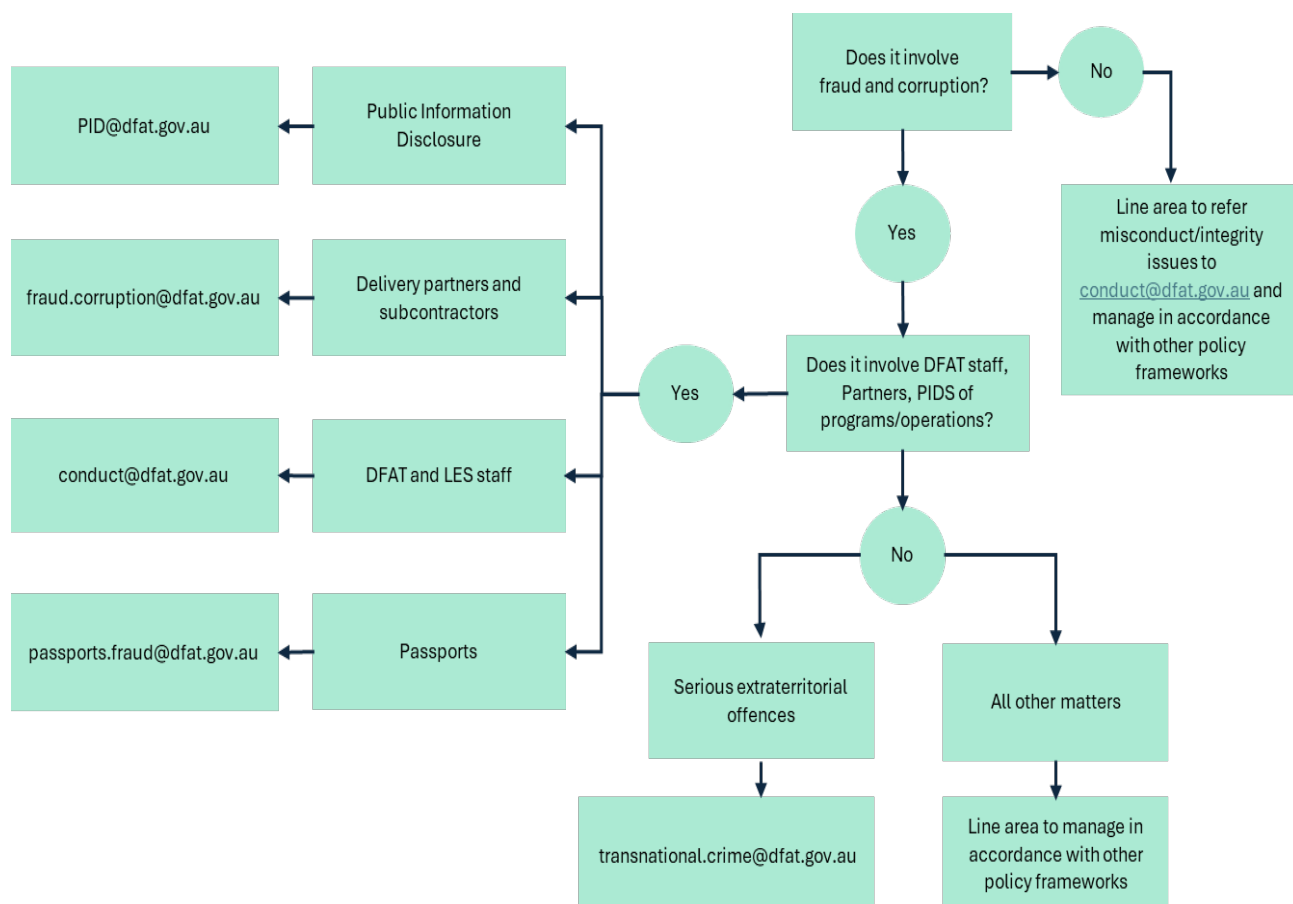
- qualified internal investigation teams, that are equipped to investigate allegations of fraud and corruption in accordance with the Australian Government Investigation Standards
- the capacity to engage appropriately qualified external investigation resources as required
- referring matters to law enforcement agencies including the AFP, the NACC and the CDDP as appropriate
- pursuing disciplinary, administrative, civil, or criminal sanctions as appropriate
- pursuing the recovery of fraudulently or corruptly obtained benefits where appropriate
- using investigation findings to inform and improve prevention and detection activities.

10. Reporting suspected incidents

DFAT emphasises that finding fraud, corruption, or foreign bribery is a positive outcome that means it can be dealt with and prevented in future. DFAT recognises that tip-offs are the most common way that fraudulent behaviour, corrupt conduct, or foreign bribery are identified. Therefore, making staff and delivery partners key to the front-line detection of such incidents.

DFAT takes all fraud, corruption, and foreign bribery allegations seriously. DFAT staff and delivery partners must report any suspicions of wrongdoing as soon as practicable.

Figure 3: Where to report incidents of suspected fraud, corruption, or foreign bribery to.



10.1 Protection against reprisals

DFAT is committed to maintaining the confidence of any person who reports any wrongdoing, including allegations of suspected fraud, corruption, or foreign bribery. Reports can be anonymous and there are protections for whistle-blowers and anyone reporting corrupt conduct in accordance with the PID Act or the NACC Act.

DFAT has **zero tolerance for reprisals against people who report wrongdoing**.

If someone who discloses or reports suspected fraud or corruption considers they have been victimised or discriminated against, please report through to the relevant area. Reprisals relating to:

- complaints made by APS and LES staff should be reported to conduct@dfat.gov.au.
- PID procedures should be reported to pid@dfat.gov.au.
- external fraud and corruption matters should be reported to fraud.corruption@dfat.gov.au.

10.2 Reporting channels

Reports of fraud and corruption can be made through the [Suspected or Detected Fraud/and or Corruption Referral Form](#) available on the DFAT website. This includes reports from members of the public, DFAT staff, contractors, and delivery partners.

While we have arrangements in place to receive and manage corruption reports, anyone can voluntarily report corruption issues directly to the NACC. Further information can be found on the [NACC's website](#).

If you are not sure of what type of fraud or corruption it is, how to report, or are unable to make a referral using the online referral form, please contact FCS at either of the following:

- By email: fraud.corruption@dfat.gov.au
- By post: Counter Fraud and Anti-Corruption Section
Department of Foreign Affairs and Trade
R.G. Casey Building
John McEwen Crescent
Barton, ACT, 0221

10.3 Guidance for reporting suspected incidents

In the first instance when suspected fraud or corruption occurs, you should note your concerns and observations.

It is important not to jump to conclusions. It may be useful to record simple observations as outlined further below.

10.4 Privacy

All fraud and corruption reports submitted to DFAT are managed in accordance with DFAT's *Fraud, Corruption and Corrupt Conduct Privacy Notice*, DFAT's Privacy Policy, and the [Privacy Act 1988](#).

If you report an allegation, you consent to your personal information (including sensitive information) and any personal information of third parties in your allegation, being managed in accordance with DFAT's *Fraud, Corruption and Corrupt Conduct Privacy Notice*. This may include disclosing information externally so that the allegation is investigated and prosecuted by the appropriate authority. DFAT maintains appropriate systems to securely store, record, report, and analyse allegations of fraud, corruption, or corrupt conduct to ensure appropriate response and satisfactory resolution.

10.5 Engagement with the NACC

The NACC investigates allegations of serious or systemic corrupt conduct in the Australian Government public sector. If a corruption issue that relates to DFAT, a DFAT staff member, or a delivery partner, is referred to the NACC (or the Commissioner becomes aware of the matter in any other way), the NACC can investigate the matter, including jointly with DFAT, or refer to DFAT to investigate.

The NACC has broad powers to request information at all stages of an investigation. This includes the power to issue directions, notices to produce and summons, which are legal documents with requirements for responding.

All DFAT staff and delivery partners should follow the reasonable instructions of any NACC staff conducting an investigation. There are penalties associated with non-compliance or providing false or misleading information in response to a NACC request. This includes destroying documents or things that are associated with the request. If you receive a request from the NACC, be mindful that it may contain restrictions on discussing information about the request, or any matter connected with the request or investigation.

FCS and EES manage the department's liaison with the NACC, in relation to both outgoing referrals and incoming requests or referrals. Please contact fraud.corruption@dfat.gov.au for further information about engagement with the NACC.