

ANTI-FRAUD RESILIENCE: THE LATEST INNOVATIONS

RSM Australia national live webinar, 30 September 2021

By: RSM's Roger Darvall-Stevens, National Head of Fraud & Forensic Services, RSM Australia, PH: 0421 056 683, Email: roger.darvall-stevens@rsm.com.au

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RSM and who is Roger Darvall-Stevens?

RSM is the 6th largest network of independent audit, tax and consulting

RSM
International



RSM
Australia



30

OFFICES



1200+

STAFF



98

YEARS

Roger Darvall-Stevens

- National Head of Fraud & Forensic Services, RSM Australia
- Over 30 years of forensic experience including a forensic Partner at a Big 4' accounting firm (EY), and former police detective
- Certified Fraud Examiner (CFE), and licensed investigator in all of Australia/NZ
- Regent Emeritus, global ACFE Board member (2012 - 2013)
- Qualifications include:
 - MBA, Master of Arts (Criminology)
 - Graduate Certificate in Fraud Investigation, BA (Police Studies and Sociology)
 - Diploma & Cert IV in Govt Fraud Control and Investigations
 - Certificate III Investigative Services

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RSM's Fraud & Forensic Services – What do we do!



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What are we going to cover?

- What is **operational resilience**, and in turn adapted to **fraud and corruption control** or other risk areas
- A summary or key points from the long-awaited revised **Australian Standard AS 8001:2021 Fraud and Corruption Control**
- **Whistleblower program** better practice incl. the Corporations Act whistleblower amendments from 2020, ASIC guidance
- **Trends and learnings** from the recent **32nd annual global ACFE fraud conference** (90 sessions, 5,000 virtual attendees)
- A **roadmap to better practice** fraud, corruption and workplace misconduct control (that is, a maturity assessment model)
- The **Commonwealth Government** (fraud) **pressure testing framework and toolkit** (applicable to govt. and private sector)
- The international standard **AS/ISO 37001 Anti-bribery systems**

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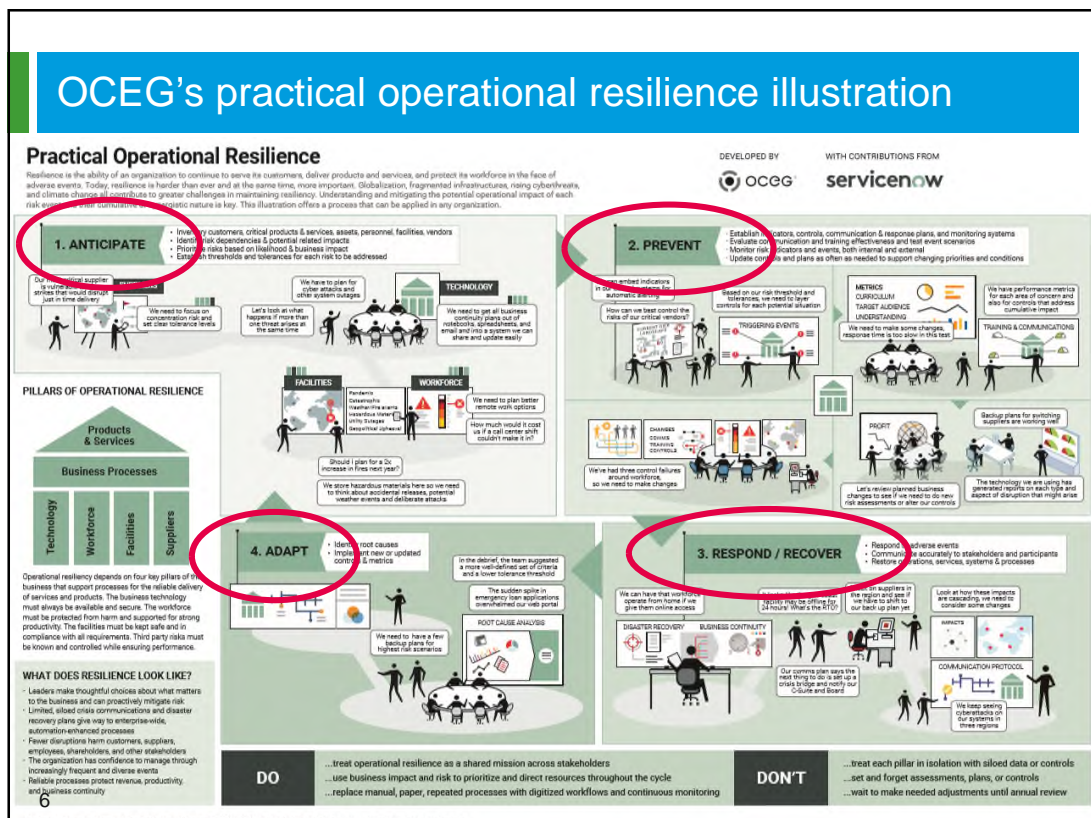
What is operational resilience, and in turn adapted to fraud and corruption control

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OCEG's resilience

- Resilience is the ability of an organisation to continue to service its customers, deliver products and services, and protect its workforce in the face of adverse events.
- Understanding and mitigating the potential operational impact of each risk event and their cumulative or synergistic nature is key. OCEG's Practical Operational Resilience illustration can be applied to any organisation.

PILLARS OF OPERATIONAL RESILIENCE

WHAT DOES RESILIENCE LOOK LIKE?

- Leaders make thoughtful choices about what matters to the business and can proactively mitigate risk
- Limited, siloed crisis communications and disaster recovery plans give way to enterprise-wide, automation-enhanced processes
- Fewer disruptions harm customers, suppliers, employees, shareholders, and other stakeholders
- The organization has confidence to manage through increasingly frequent and diverse events
- Reliable processes protect revenue, productivity, and business continuity

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OCEG's operational resilience: 1. Anticipate

1. ANTICIPATE

- Inventory customers, critical products & services, assets, personnel, facilities, vendors
- Identify risk dependencies & potential related impacts
- Prioritize risks based on likelihood & business impact
- Establish thresholds and tolerances for each risk to be addressed

SUPPLIERS

Our most critical supplier is vulnerable to labor strikes that would disrupt just in time delivery

We need to focus on concentration risk and set clear tolerance levels

TECHNOLOGY

We have to plan for cyber attacks and other system outages

Let's look at what happens if more than one threat arises at the same time

We need to get all business continuity plans out of notebooks, spreadsheets, and email and into a system we can share and update easily

FACILITIES

Pandemic
Catastrophic Weather/Fire events
Hazardous Materials
Utility Outages
Geopolitical Upheaval

Should I plan for a 2x increase in fires next year?

We store hazardous materials here so we need to think about accidental releases, potential weather events and deliberate attacks

WORKFORCE

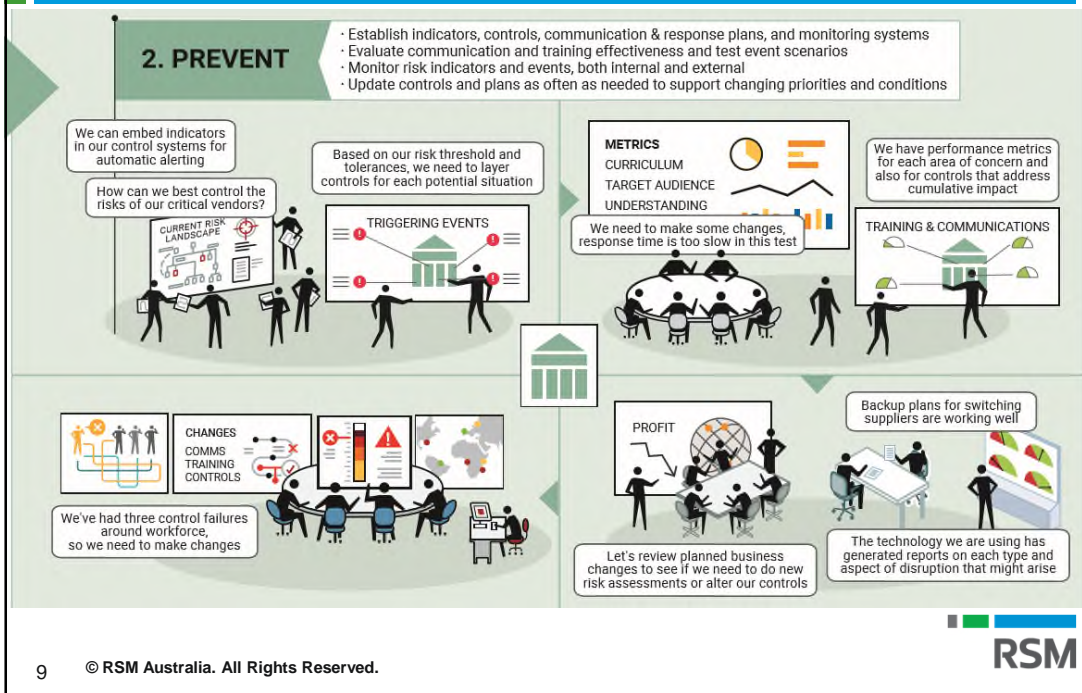
We need to plan better remote work options

How much would it cost us if a call center shift couldn't make it in?

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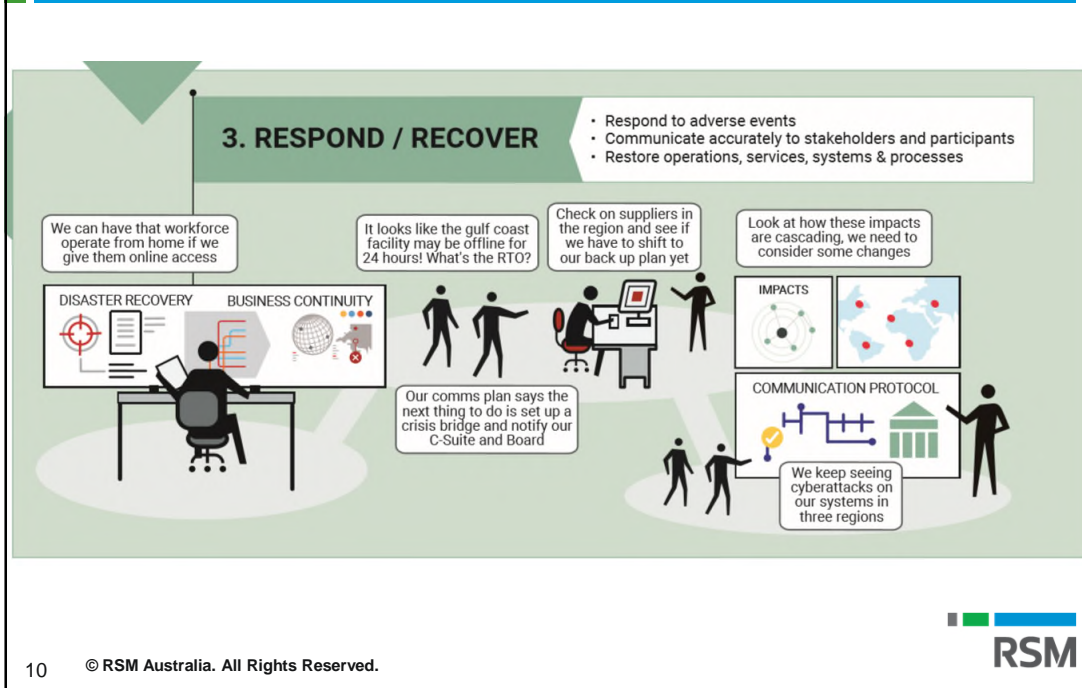
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OCEG's operational resilience: 2. Prevent



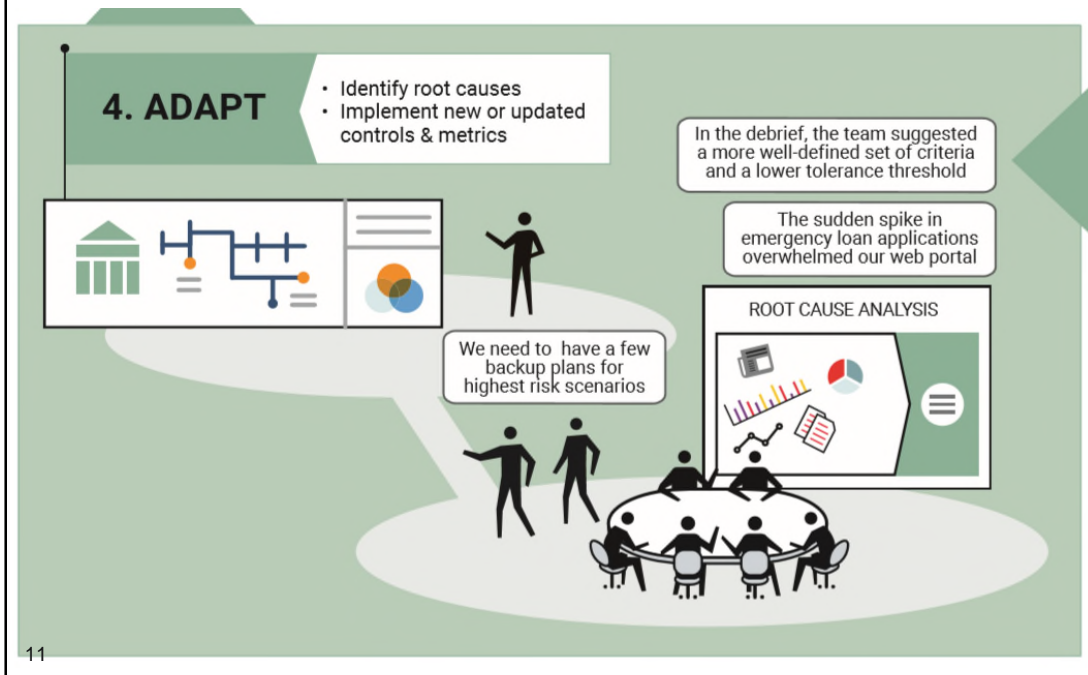
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OCEG's operational resilience: 3. Respond / Recover



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OCEG's operational resilience: 4. Adapt



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A summary or key points from
the long-awaited
revised **Australian Standard
AS 8001:2021 Fraud and
Corruption**

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Other better practices, with AS 8001 being the most recognised



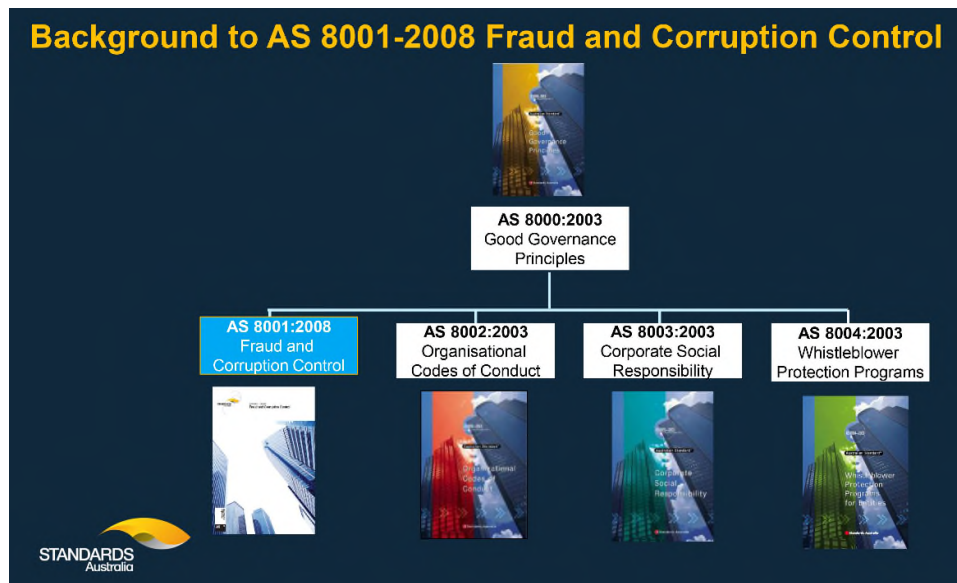
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Australian Standard AS 8001-2008 Fraud & Corruption Control

Background to AS 8001-2008 Fraud and Corruption Control



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Australian Standard AS 8001-2008 Fraud & Corruption Control

The flowchart shows the hierarchy of AS 8001-2008. At the top is 'AS 8001-2008 Fraud and corruption control'. It branches into 'Section 2 Planning and Resourcing', 'Section 3 Prevention', 'Section 4 Detection', and 'Section 5 Response'. Each section has a list of sub-clauses. A large red 'SUPERSEDED' watermark is diagonally across the center.

Section 2 Planning and Resourcing	Section 3 Prevention	Section 4 Detection	Section 5 Response
2.1 Application	3.1 Application	4.1 Application	5.1 Application
2.2 Fraud and corruption control planning	3.2 Implementing and maintaining an integrity framework	4.2 Implementing a fraud and corruption detection program	5.2 Policies and procedures
2.3 Review of the fraud and corruption control plan	3.3 Senior Management commitment, controlling the risks of fraud and corruption	4.3 Role of the external auditor in detection of fraud	5.3 Investigation
2.4 Fraud and corruption control resources	3.4 Line management accountability	4.4 Avenues for reporting suspected incidents	5.4 Internal reporting and escalation
2.5 Internal audit activity in the control of fraud and corruption	3.5 Internal control	4.5 Whistleblower protection program	5.5 Disciplinary procedures
	3.6 Assessing fraud and corruption risk		5.6 External reporting
	3.7 Communication and awareness		5.7 Civil action for recovery of losses
	3.8 Employment screening		5.8 Review of internal controls
	3.9 Supplier and customer vetting		5.9 Insurance
	3.10 Controlling the risk of corruption		

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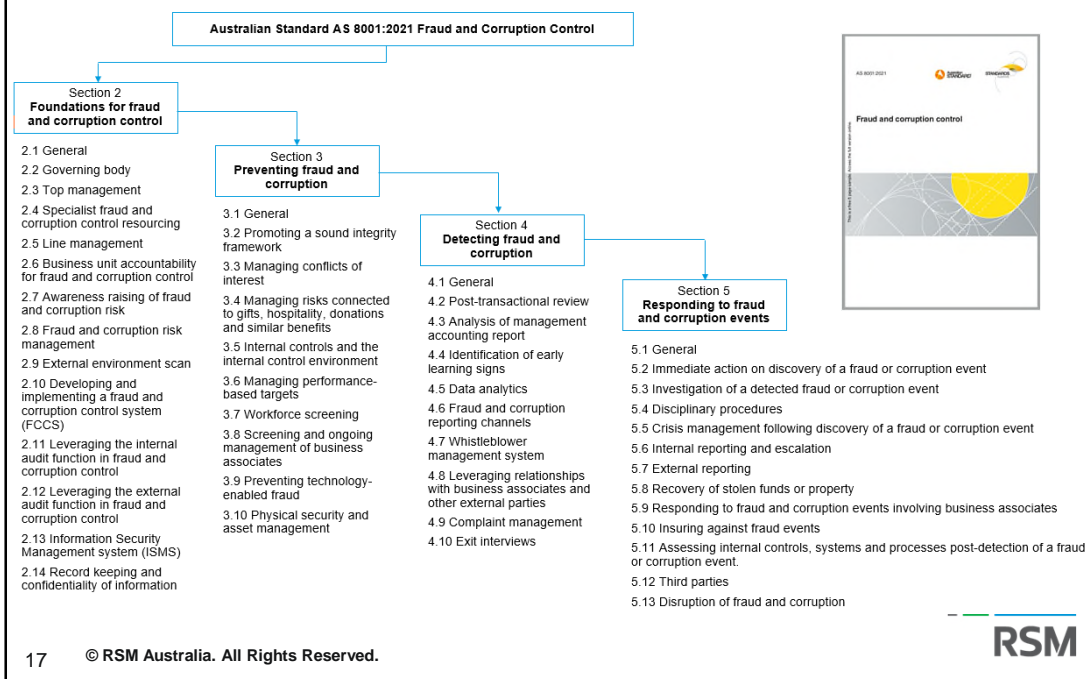
Australian Standard AS 8001:2021 Fraud & Corruption Control

The image shows the front cover of the AS 8001:2021 standard. It features the title 'AS 8001:2021 Fraud and corruption control' at the top. Below the title is a large graphic with overlapping circles in grey and yellow. The Australian Standard logo and the Standards Australia logo are in the top right corner. A small vertical text on the left side of the graphic reads: 'This is a free 5 page sample. Access the full version online.'

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Australian Standard AS 8001:2021 Fraud & Corruption Control



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Aust. Standard AS 8001:2021 Fraud and Corruption Control

1.4.14

fraud and corruption control system

FCCS

framework for controlling the risks of fraud and corruption against or by an organization

Note 1 to entry: This is also referred to as a fraud and corruption control framework (FCCF).

2.10.3 Documenting the fraud and corruption control system (FCCS)

Organizations shall document the FCCS. [Table 2](#) includes a recommended structure for this documentation, which can be tailored to the organization's specific requirements.

Table 2 — Structure of FCCS documentation

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Aust. Standard AS 8001:2021 – main changes

1. Restructuring but still with an emphasis on fraud and corruption prevention, detection and response
2. Minimum requirement clarification in terms of 'shall' (not the previous 'should') do certain things to conform to the standard
3. A 'Fraud and Corruption Control System (FCCS)' (also referred to as a framework) replaces a 'Fraud and Corruption Control Plan' with documentation still required (that is, a policy and procedure, or plan) but as part of the overall system
4. Harmonising AS 8001:2021 with AS/ISO 37001-2019 Anti-Bribery Management Systems
5. Requirement for an 'Information Security Management System (ISMS)' consistent with ISO / IEC 27001 Information technology – Security techniques – Information security management systems



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Aust. Standard AS 8001:2021 – normative references

6. The introduction of normative references which are other standards with which conformance is required before AS 8001:2021 conformance can be achieved -

AS 4811, *Employment screening*

AS ISO 31000, *Risk management — Guidelines*

AS ISO 37001, *Anti-bribery management systems — Requirements with guidance for use*

AS ISO/IEC 27001, *Information technology — Security techniques — Information security management systems — Requirements*

ISO/IEC 27037, *Information technology — Security techniques — Guidelines for identification, collection, acquisition and preservation of digital evidence*

ISO/IEC 27041, *Information technology — Security techniques - Guidance on assuring suitability and adequacy of event investigative method*

ISO/IEC 27042, *Information technology — Security techniques - Guidelines for the analysis and interpretation of digital evidence*

ISO/IEC 27043, *Information technology — Security techniques - Incident investigation principles and processes*

ASA 240 *The Auditor's Responsibilities Relating to Fraud in an Audit of a Financial Report issued by the Auditing and Assurance Standards Board*

20 NIST SP 800-61 Rev. 2, *Computer Security Incident Handling Guide*

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Aust. Standard AS 8001:2021 – main changes

6. Updated definitions

7. Updated guidance on prevention, detection and response for

- ✓ The role of 'Governing Body' and 'Top Management'
- ✓ Specialist resources (incl. investigator expertise and safety)
- ✓ External attack particularly cyber attack
- ✓ Whistleblowing
- ✓ Workforce and business associations screening
- ✓ Fraud and corruption risk assessment
- ✓ Immediate action on the discovery of a fraud or corruption event, including digital evidence first response
- ✓ Separation of investigation and determination processes
- ✓ Fraud and corruption event register

8. Introduction of 'pressure testing' for internal control systems

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Australian Standard AS 8001:2021 Fraud & Corruption Control

Section 2
Foundations for fraud and corruption control

<p>2.1 General</p> <p>2.2 Governing body</p> <p>2.3 Top management</p> <p>2.4 Specialist fraud and corruption control resourcing</p> <p>2.5 Line management</p> <p>2.6 Business unit accountability for fraud and corruption control</p> <p>2.7 Awareness raising of fraud and corruption risk</p> <p>2.8 Fraud and corruption risk management</p> <p>2.9 External environment scan</p> <p>2.10 Developing and implementing a fraud and corruption control system (FCCS)</p> <p>2.11 Leveraging the internal audit function in fraud and corruption control</p> <p>2.12 Leveraging the external audit function in fraud and corruption control</p> <p>2.13 Information Security Management system (ISMS)</p> <p>2.14 Record keeping and confidentiality of information</p>	<p>2.1 General</p> <p>2.2 Governing body</p> <p>2.3 Top management</p> <p>2.4 Specialist fraud and corruption control resourcing</p> <p>2.5 Line management</p> <p>2.6 Business unit accountability for fraud and corruption control</p> <p>2.7 Awareness raising of fraud and corruption risk</p> <p>2.8 Fraud and corruption risk management</p> <p>2.9 External environment scan</p> <p>2.10 Developing and implementing a fraud and corruption control system (FCCS)</p> <p>2.11 Leveraging the internal audit function in fraud and corruption control</p> <p>2.12 Leveraging the external audit function in fraud and corruption control</p> <p>2.13 Information Security Management system (ISMS)</p> <p>2.14 Record keeping and confidentiality of information</p>
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Australian Standard AS 8001:2021 Fraud & Corruption Control

Section 2
Foundations for
and corruption ex

2.1 General

2.2 Governing body

2.3 Top management

2.4 Specialist fraud
corruption control re

2.5 Line management

2.6 Business unit ac
for fraud and corrup

2.7 Awareness raisi
and corruption risk

2.8 Fraud and corrup
management

2.9 External environ

2.10 Developing an
implementing a frau
corruption control s
(FCCS)

2.11 Leveraging the
audit function in frau
corruption control


2.12 Leveraging the
audit function in frau
corruption control

2.13 Information Se
Management system

2.14 Record keepin
confidentiality of info

Section 3 Preventing fraud and corruption

- 3.1 General
- 3.2 Promoting a sound integrity framework
- 3.3 Managing conflicts of interest
- 3.4 Managing risks connected to gifts, hospitality, donations and similar benefits
- 3.5 Internal controls and the internal control environment
- 3.6 Managing performance-based targets
- 3.7 Workforce screening
- 3.8 Screening and ongoing management of business associates
- 3.9 Preventing technology-enabled fraud
- 3.10 Physical security and asset management



corruption control

corruption event

event

fraud or corruption event

involving business associates

processes post-detection of a fraud

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Australian Standard AS 8001:2021 Fraud & Corruption Control

Section 4
Detecting fraud and
corruption

4.1 General

4.2 Post-transactional review

4.3 Analysis of management accounting report

4.4 Identification of early learning signs

4.5 Data analytics

4.6 Fraud and corruption reporting channels

4.7 Whistleblower management system


4.8 Leveraging relationships with business associates and other external parties

4.9 Complaint management

4.10 Exit interviews

Section 4 Detecting fraud and corruption

- 4.1 General
- 4.2 Post-transactional review
- 4.3 Analysis of management accounting report
- 4.4 Identification of early learning signs
- 4.5 Data analytics
- 4.6 Fraud and corruption reporting channels
- 4.7 Whistleblower management system
- 4.8 Leveraging relationships with business associates and other external parties
- 4.9 Complaint management
- 4.10 Exit interviews



control

in event

corruption event

business associates

post-detection of a fraud

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Australian Standard AS 8001:2021 Fraud & Corruption Control

**Section 5
Responding to fraud and corruption events**

- 2.1 General
- 2.2 Governance
- 2.3 Top management
- 2.4 Specialised corruption control
- 2.5 Line management
- 2.6 Business processes for fraud and corruption
- 2.7 Awareness and corruption
- 2.8 Fraud and corruption management
- 2.9 External reporting
- 2.10 Developing and implementing corruption control (FCCS)
- 2.11 Leveraging audit function corruption control
- 2.12 Leveraging audit function corruption control
- 2.13 Information Management
- 2.14 Record confidentiality

- 5.1 General
- 5.2 Immediate action on discovery of a fraud or corruption event
- 5.3 Investigation of a detected fraud or corruption event
- 5.4 Disciplinary procedures
- 5.5 Crisis management following discovery of a fraud or corruption event
- 5.6 Internal reporting and escalation
- 5.7 External reporting
- 5.8 Recovery of stolen funds or property
- 5.9 Responding to fraud and corruption events involving business associates
- 5.10 Insuring against fraud events
- 5.11 Assessing internal controls, systems and processes post-detection of a fraud or corruption event.
- 5.12 Third parties
- 5.13 Disruption of fraud and corruption

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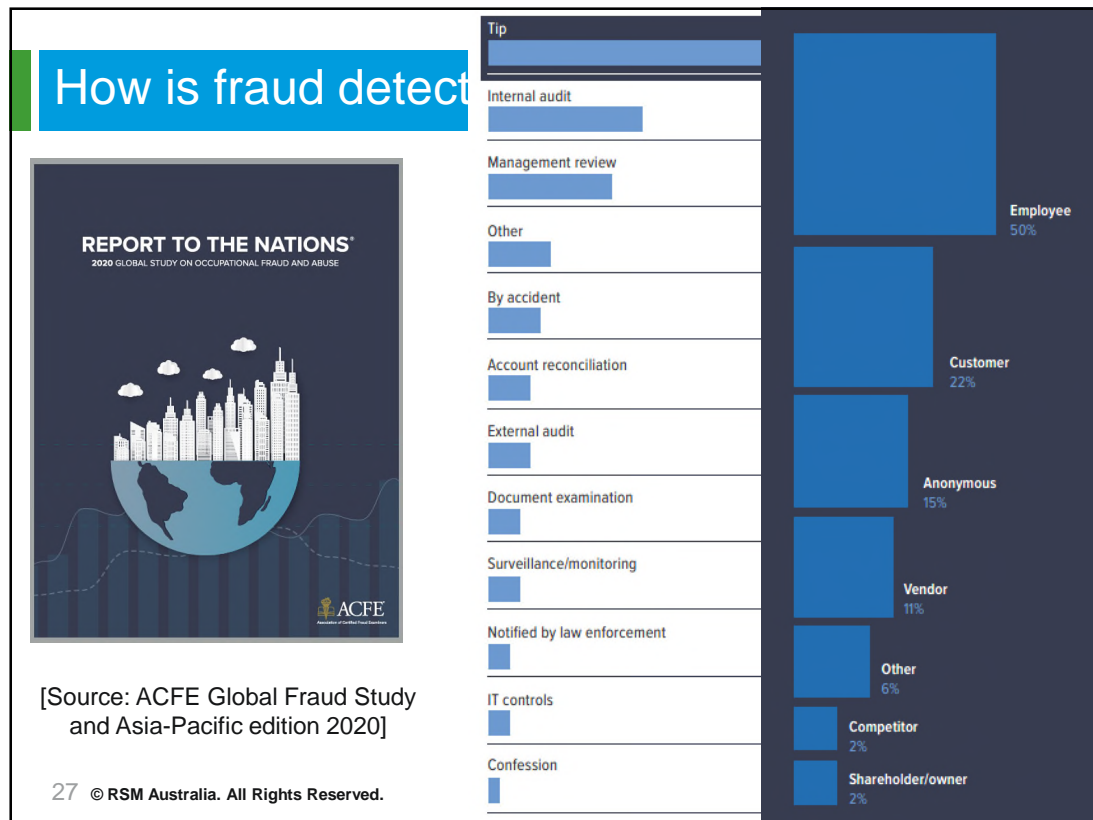
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Whistleblower program better practice incl. the Corporations Act whistleblower amendments from 2020, ASIC guidance

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Whistleblower legislation – Corporations Act amendments



Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019

No. 10, 2019

An Act to amend the law in relation to whistleblowing, and for related purposes

Contents

1..... Short title.....	1
2..... Commencement.....	2
3..... Schedules.....	3

Schedule 1—Amendments

Part 1—Amendment of the Corporations Act 2001	4
<i>Corporations Act 2001</i>	4
Part 2—Amendment of the Taxation Administration Act 1953	25
<i>Taxation Administration Act 1953</i>	25



REGULATORY GUIDE 270

Whistleblower policies

November 2019

About this guide

This guide is for entities that must have a whistleblower policy under the Corporations Act—public companies, large proprietary companies and proprietary companies that are trustees of regulated superannuation entities. It gives guidance to help these entities establish a whistleblower policy that complies with their legal obligations. It also contains our good practice guidance on implementing and maintaining a whistleblower policy.

This guide will also help entities that are not required to have a whistleblower policy but are required to manage whistleblowing in accordance with the Corporations Act.

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Corporations Act WB reforms summary

- Eligible whistleblower is **a current or former:**
 - a) Officer (usually that means a director or company secretary)
 - b) Employee
 - c) Contractor (or contractor's employee) including volunteers
 - d) Associate of the company (such as a business the company acts in concert)
 - e) Trustee, custodian or investment manager of a superannuation entity, or an officer, employee, or a goods or service provider to a trustee, custodian, investment manager
 - f) Spouse, relative or dependant of one of the above people referred to in a) to e)
- **Note: an offence to disclose info./communicate info. likely to identify the whistleblower**

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Corporations Act - WB Policy must contain:

- 1) The protections available to whistleblowers; and
- 2) To whom disclosures that qualify for protection may be made, and how they may be made; and
- 3) How the company will support whistleblowers and protect them from detriment; and
- 4) How the company will investigate disclosures that qualify for protection; and
- 5) How the company will ensure fair treatment of employees of the company who are mentioned in disclosures that qualify for protection, or to whom such disclosures relate; and
- 6) How the policy is to be made available to officers and employees of the company; and
- 7) Any matters prescribed.

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The Sydney Morning Herald

Corporate whistleblower policies falling short: ASIC

 By **Clancy Yeates**
May 5, 2021 — 5:09pm

The corporate watchdog is urging companies to update their whistleblower protection policies, after finding many firms had not kept up with laws aimed at supporting staff who raise the alarm.

Under 2019 reforms, laws to protect whistleblowers were expanded to cover a larger group of staff from the corporate sector, and workers were also given more protection. The reforms included changes to guard whistleblowers' confidentiality, and to prevent them from being threatened for their actions.

ASIC commissioner Cathie Armour said companies should review their whistleblower policies and practices. JAMES ALCOCK

However, ASIC Commissioner Cathie Armour on Wednesday said the regulator's review of company whistleblower policies had identified some "areas for improvement."

Ms Armour cited a few problems, including that close to half of the policies examined by ASIC did not fully explain how staff could report misconduct and qualify for legal protection.

She added that 21 per cent of the policies reviewed by ASIC incorrectly said staff who blew the whistle anonymously would not qualify for protection.

"This suggests that they have not been updated to reflect the new laws which expand whistleblower protections," Ms Armour said at a Governance Institute of Australia event.

"We call on companies to review their own whistleblower policies and practices to make sure they are up to date and to revise their policies and procedures if they aren't."

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Transparency International: WB movies you can't miss!



Paramount Pictures/Open Road Films/Summa Video Pictures

Snowden (2016)
Whistleblower: Edward Snowden
Case: NSA surveillance techniques

The Post (2017)
Whistleblower: Daniel Ellsberg
Case: Pentagon Papers

The Informant (2009)
Whistleblower: Mark Whitacre
Case: Price-fixing in agriculture

Silkwood (1983)
Whistleblower: Karen Silkwood
Case: Kerr-McGee nuclear site safety

The Insider (1999)
Whistleblower: Jeffrey Wigand
Case: Big tobacco and the addictive levels of nicotine

Serpico (1973)
Whistleblower: Frank Serpico
Case: New York Police Department corruption

All the Presidents Men (1976)
Whistleblower: Deep Throat
Case: Watergate scandal

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Trends and learnings from the recent 32nd annual global ACFE fraud conference (90 sessions, 5,000 virtual attendees)

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Association of Certified Fraud Examiners (ACFE)

- The Association of Certified Fraud Examiners
- Pre-eminent global anti-fraud professional association
- 85,000 members in over 180 countries
- Annual conference
- www.ACFE.com (free info. without being a member)
- CFE (Certified Fraud Examiner) global certification for anti-fraud professionals
- Produces two yearly Global Fraud Study



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2021 ACFE 32nd Annual Global Fraud Conference (virtual)



BREAK THROUGH **ACFE GLOBAL FRAUD CONFERENCE** June 21-23

NETWORK ONLINE WITH MORE THAN **5,000 ATTENDEES**

EARN MORE THAN **30 CPE**


CHOOSE FROM **90+** EDUCATIONAL SESSIONS

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VIDEO – ACFE anti-fraud awareness videos

Common Computer and Internet Fraud Schemes



Social Engineering

- Phishing (Email icon)
- SMShing (New Message icon)
- Pharming (Web browser icon)

Ransomware

Install Malware? **Yes!**

You are locked out! **PAY US**

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What The Fraud (WTF)!

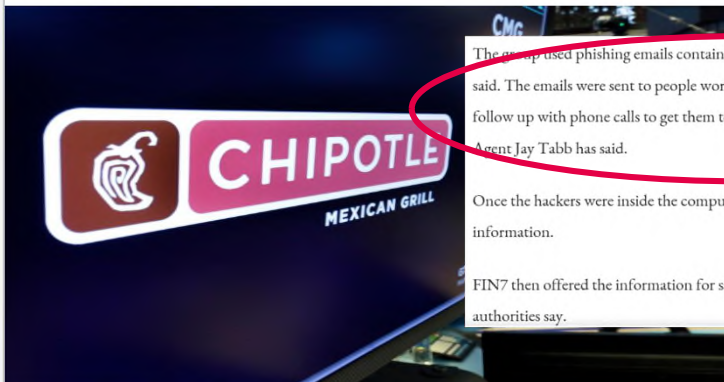


Roger Darvall-Stevens, MBA, MA, CFE

Partner/Director, National Head of Fraud & Forensic Services, Australia, RSM

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#WTF (What The **#Fraud**)! A variation on the traditional phishing scams with the fraudsters making follow-up calls to recipients to convince them to click on the email infected link.



Ukrainian man pleads guilty to hacking, wire fraud charges

columbian.com

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2021 ACFE's Fraud Awareness Trng. Benchmark Rpt



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2020 ACFE Anti-Fraud Playbook

Fraud Risk Governance



1. [Understand Where You Are and Where You Want to Be](#)
2. [Create a Culture](#)

Fraud Investigation and Corrective Action



7. [Lay the Groundwork for Investigations](#)
8. [Conduct Investigations](#)

Fraud Risk Assessment



3. [Think Like a Fraudster](#)
4. [Discover What You Don't Know](#)

Fraud Risk Management Monitoring Activities



9. [Monitor Your Progress](#)
10. [Report on Your Progress](#)

Fraud Control Activities



5. [Use Data to Uncover Fraud](#)
6. [Knowledge Is Power](#)



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2020 ACFE Anti-Fraud Playbook

FIG. 6 Steps of a Fraud Risk Assessment



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2019 ACFE/SAS Anti-Fraud Technology Benchmark Report

ANTI-FRAUD
TECHNOLOGY
BENCHMARKING REPORT

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DEVLOPED IN PARTNERSHIP WITH

2019 ACFE/SAS Anti-Fraud Technology Benchmark Report

FIG. 2 What are the most common programs for each analytic technique?

Exception reporting/ anomaly detection	Automated red flags/ business rules	Data visualization	Predictive analytics/ modeling	Link analysis/ social network analysis	Text mining	Geographic data mapping	Artificial intelligence/ machine learning	Emotional tone/ sentiment analysis
Excel	In-house	Tableau	In-house	i2 Analysts Notebook	ACL	In-house	In-house	In-house
ACL	ACL	Excel	Excel	In-house	Excel	Tableau	Python	SAS
In-house	Excel	Power BI	ACL	SAS	In-house	Google	SAS	
IDEA	IDEA	In-house	SAS	LexisNexis	Python	Excel		
SAP	SAP	ACL	IDEA	Facebook	SAS	Power BI		

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2017-19 ACFE In-House Fraud Investigation Teams Benchmarking Rpts



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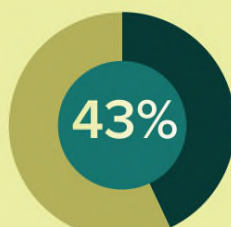
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2019 ACFE In-House Fraud Investigation Teams Benchmarking Reports

Key Findings

TOP 3 PROFESSIONAL QUALIFICATIONS
DESIRED FOR FRAUD INVESTIGATORS:

- 1 Professional licenses and certifications
- 2 Prior investigation experience
- 3 Relevant education and degrees



of fraud investigators on in-house
investigation teams hold the
CFE credential

ORGANIZATIONS TYPICALLY EMPLOY

2.21



FRAUD INVESTIGATORS FOR EVERY

1,000

EMPLOYEES THEY HAVE ON STAFF

22%

of fraud investigation teams
report directly to the

CEO OR SENIOR MANAGEMENT



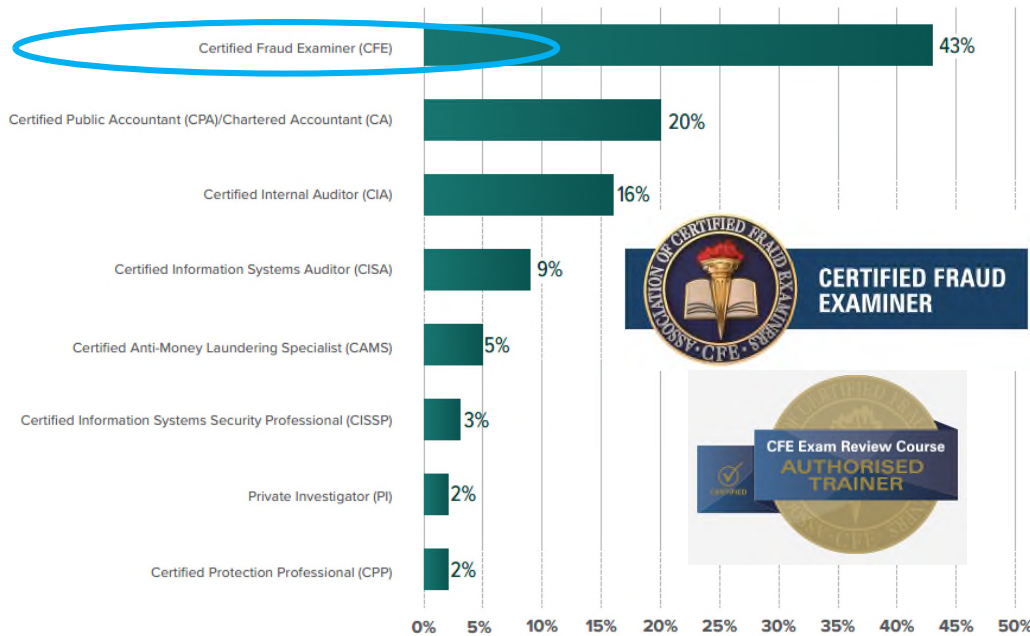
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2019 ACFE In-House Fraud Investigation Teams Benchmarking Report

FIG. 5 What percentage of fraud investigators hold professional designations?



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ACFE – CFE (Certified Fraud Examiner) training / credential

RSM is the exclusive Authorised Trainers in Australia for the global ACFE (Association of Certified Fraud Examiner) CFE (Certified Fraud Examiners) Exam Review Course

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~~Completed~~
Tuesday 23 March -
Friday 26 March 2021

~~Completed~~
Tuesday 20 July -
Friday 23 July 2021

Tuesday 12 October -
Friday 15 October 2021



- Investigation
- Law
- Financial Transactions and Fraud Schemes
- Fraud Prevention and Deterrence

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A roadmap to better practice fraud, corruption and workplace misconduct control (that is, a maturity assessment model)

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Aust. Standard AS 8001:2021 Fraud and Corruption Control

1.4.14

fraud and corruption control system

FCCS

framework for controlling the risks of fraud and corruption against or by an organization

Note 1 to entry: This is also referred to as a fraud and corruption control framework (FCCF).

2.10.3 Documenting the fraud and corruption control system (FCCS)

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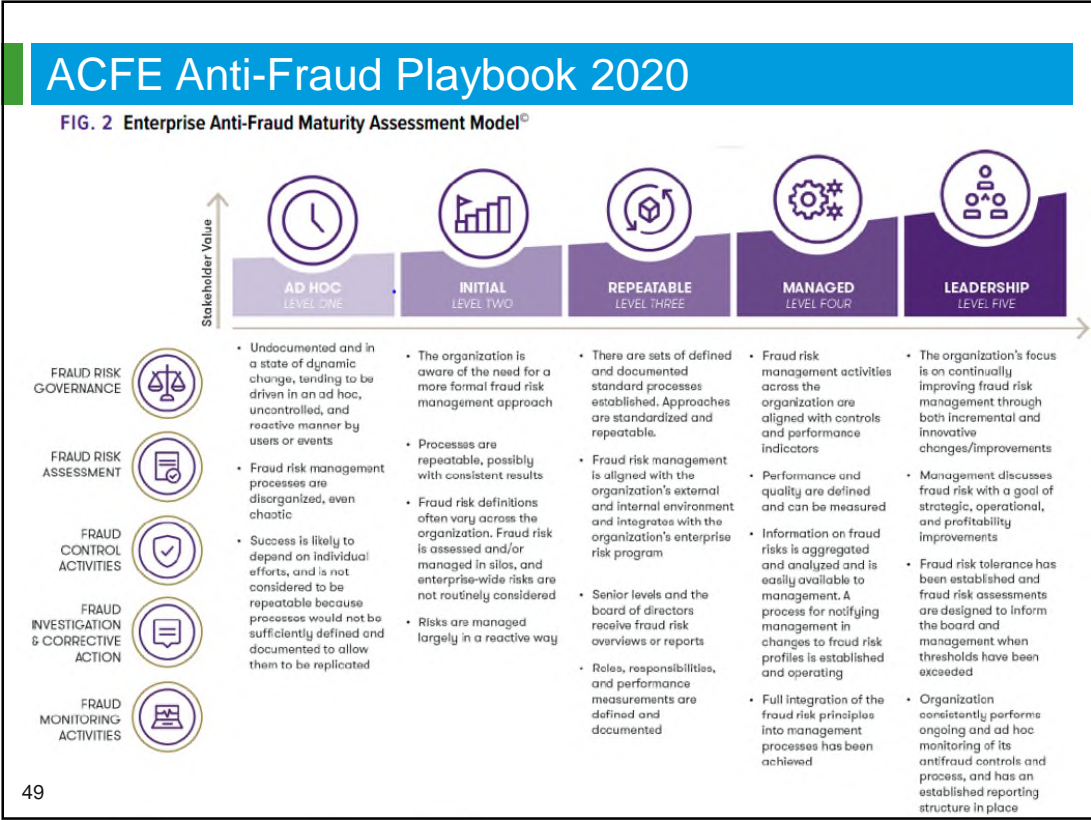
Table 2 — Structure of FCCS documentation

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The Commonwealth Government (fraud) pressure testing framework and toolkit (applicable to govt. and private sector)

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Fraud pressure testing in AS 8001:2021

- The revised AS 8001:2021 (released 11 June 2021) includes fraud pressure testing of internal controls as a key part of an organisation's Fraud and Corruption Control System (FCCS)



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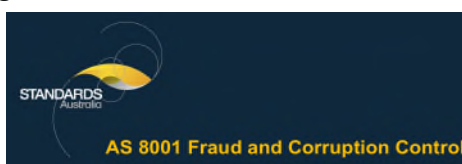


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Fraud pressure testing in AS 8001:2021

Pressure testing is:

- ✓ The assessment aimed at the effectiveness (or not) of internal controls that are specifically designed or intended to mitigate fraud and corruption risk
- ✓ Involves an internal or external individual or team using a range of methodologies to test the effectiveness of pre-existing or proposed internal controls
- ✓ Identification of these gaps (or improvement opportunities) will assist in deterring fraudulent attacks by its pressure testing activities and help you identify weaknesses in your business necessitating rectification or remediation



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The new Commonwealth Fraud Prevention Centre



Australian Government
Attorney-General's Department

Commonwealth
Fraud Prevention
Centre

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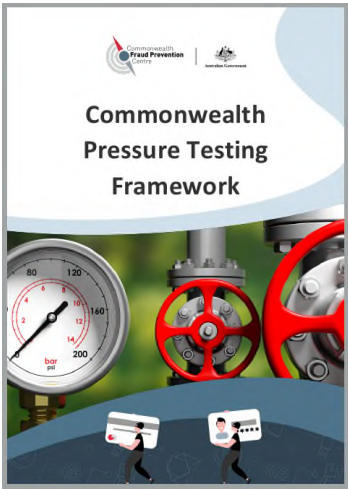
**We help the Commonwealth deal with
unseen and unchecked fraud.**

Equip. Enable. Empower.

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The Commonwealth Pressure Testing Framework



Commonwealth
Pressure Testing
Framework

The Commonwealth Fraud Prevention Centre's publication of a pressure testing framework has accompanied tools and guidance for three identified processes of:

1. Targeted assessments – these are simple and quick to do
2. Critical assessments – these help you zone in on your most important countermeasures
3. Comprehensive assessments – do these after you have built up your capability and resources

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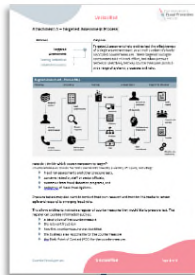
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The Commonwealth Pressure Testing Framework

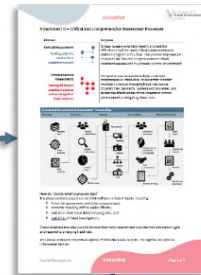
Pressure Testing Framework



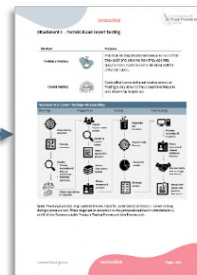
Attachment A – Process for Targeted Assessments



Attachment B – Process for Critical and Comprehensive Assessments



Attachment C – Technical and Covert Testing



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The international standard AS/ISO 37001 Anti-bribery systems

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The perceived levels of public sector corruption in 180 countries/territories around the world.

[illegible]

ISO 37001 Anti-bribery management systems 2016



Controls:

1. Bribery risk assessment
2. Tone from the top
3. Anti-bribery compliance function
4. Employment (due diligence, performance bonuses, conflicts of interest)
5. Awareness and training
6. Due diligence
7. Financial controls
8. Non-financial controls

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Crimes Legislation Amendment (Combating Corporate Crime) Bill 2019



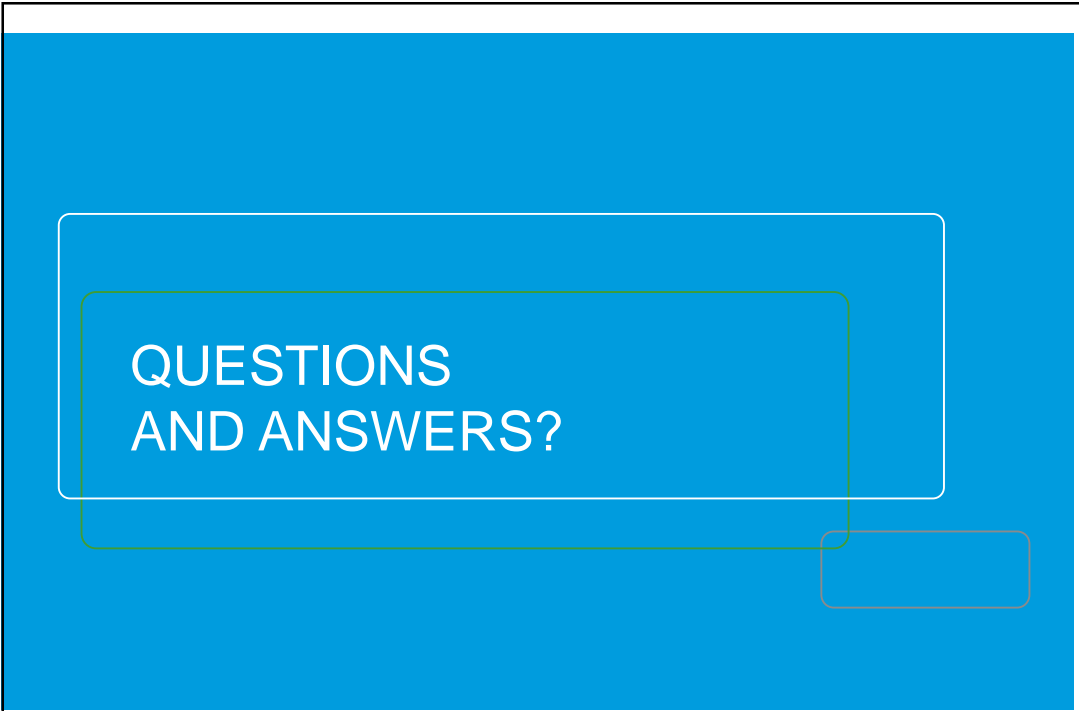
TRANSPARENCY INTERNATIONAL AUSTRALIA

Transparency International Australia 15 July 2021 update

The past month has had its disappointments. The long overdue Combating Corporate Crime Bill amendments again failed to make it onto the list and be debated in Parliament. The Bill proposes, amongst other measures, a new corporate offence of failure to prevent foreign bribery, expands the scope of the foreign bribery offence and will introduce a deferred prosecution agreement scheme.

Sure, COVID-19 may have caused a backlog, but we also know that in any crisis bribery and corruption flourish and COVID-19 is no different. Now is not the time to be delaying stronger laws to prevent and detect foreign bribery and strengthen enforcement.

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QUESTIONS AND ANSWERS?

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