



Australian Government  
Australian Submarine Agency

**ASA**

# Australian Submarine Agency Fraud and Corruption Control Plan

**2025-2027**



## ACKNOWLEDGEMENT OF COUNTRY

The Australian Submarine Agency acknowledges the Traditional Custodians of Country throughout Australia. The ASA recognises their continuing connection to traditional lands and waters and would like to pay respect to their Elders both past and present.



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# Director-General's Foreword

The Australian Submarine Agency (ASA) has been entrusted with one of the most significant and complex national endeavours in our history. This involves the acquisition, construction, delivery, technical governance, sustainment and eventual disposal of Australia's conventionally-armed, nuclear-powered submarine capability.

This multi-decade, whole of nation effort demands seamless collaboration across the Defence portfolio, Commonwealth departments and agencies, and with our key international partners the United Kingdom and the United States of America.

The scale, complexity and strategic importance of this undertaking require nothing less than the highest standards of integrity, accountability and public stewardship. Maintaining public trust and confidence in our management of this critical national investment is critical.

The ASA is committed to a culture that rejects fraudulent and corrupt behaviour in all forms. Every individual who works for, or with, the ASA is expected to act with integrity, fostering a culture of honesty and accountability. These core behaviours must underpin all of our actions and decisions to ensure we manage public resources and funds responsibly and with transparency.

Given the magnitude of this capability lifespan, the ASA is exposed to significant and unique fraud and corruption risks, which have the potential to compromise the safety and security of our people, our assets and to undermine public confidence in our ability to act as trusted custodians of public funds.

The *ASA Fraud and Corruption Control Plan 2025-27* sets out the agency's framework to prevent, detect and respond to fraud and corruption. It provides practical guidance to all ASA personnel, and those who do business with us, on their roles and responsibilities in protecting the integrity of our operations.

I encourage every member of the ASA community – employees, seconded personnel, contractors and partners alike – to familiarise themselves with this Plan, report incidents of suspected fraud and corruption, and work with us to uphold public trust and confidence in the agency to deliver Australia's submarine capability.

**Vice Admiral Jonathan Mead AO RAN**  
Director-General Australian Submarine Agency





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# 1. Introduction

**The ASA was established on 1 July 2023 to manage and oversee the safe and secure delivery of Australia's Nuclear-Powered Submarine Program (NPS Program). The agency will safely and securely acquire, construct, deliver, technically govern, sustain and dispose of Australia's conventionally-armed, nuclear-powered submarine capability, via the AUKUS partnership.**

The ASA Fraud and Corruption Control Plan 2025-27 (the Plan) outlines ASA's commitment and approach to prevent, detect and respond to fraud and corruption and manage fraud and corruption risks.

The Plan is aligned to the ASA Risk Management Framework and the mandatory requirements of the Commonwealth Fraud and Corruption Control Framework 2024, as per the *Public Governance, Performance and Accountability Act 2013* (PGPA Act); and provides guidance to ASA personnel, contractors, consultants and outsourced service providers on their responsibilities to prevent, detect, report and respond to fraud and corruption.







## 2. What is Fraud and Corruption?

**The ASA uses fraud and corruption definitions as prescribed in the 2024 Commonwealth Fraud and Corruption Control Framework.**

### Fraud

Fraud 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."*

A benefit or loss is not limited to a material benefit or loss. It may be tangible or intangible, such as access to information. An individual or a third party can obtain the benefit (or cause the loss). The conduct does not need to represent a breach of criminal law.

Fraud requires intent. When intent cannot be established, the incident may be classified as non-compliance, for example failing to meet obligations under applicable laws, regulations, agreements, contracts or other requirements.

Examples of fraud include:

- abuse of official position to obtain a benefit for oneself or someone else
- theft or misuse of Commonwealth resources, assets, equipment or facilities
- unlawfully obtaining property, equipment, material or services
- falsely claiming employee entitlements such as medical leave, travel or overtime; or duplicitously claiming from ASA and Defence
- misuse of ASA expense or travel cards
- procurement-related fraud such as contractors or suppliers providing false or misleading information to make a claim for a payment, good or service
- procurement-related fraud such as contractors or suppliers inflating prices, delivering sub-standard goods or services providing false or misleading information when applying for a job (including falsifying qualifications)
- unauthorised access, modification, theft or disclosure of ASA information or intellectual property
- assume (or attempt to assume) another person's identity to gain a benefit or advantage.

### Corruption

Corruption is defined as *"any conduct that does or could compromise the integrity, accountability or probity of public administration."*

Corruption includes:

- any conduct of any person (whether or not a staff member of a Commonwealth agency) that adversely affects, or that could adversely affect, either directly or indirectly:
  - the honest or impartial exercise of any Commonwealth agency staff member's powers, or
  - the honest or impartial performance of any public official's functions or duties
- 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, or 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.

Examples of corruption include:

- undeclared or unmanaged conflict of interest
- collusion between an ASA official and a contractor, consultant or outsourced service provider
- bribery
- obtaining, offering or soliciting secret commissions, kickbacks or gratuities
- abuse of office - where one or more individuals manipulate a procurement process
- nepotism - the preferential treatment of family members (particularly in employment)
- cronyism - the preferential treatment of friends and associates
- insider trading - misusing official information to gain an unfair private, commercial or market advantage for self or others.





## 3. Leadership and Integrity

**Effective fraud and corruption control relies on strong leadership, a culture of integrity, and robust control frameworks.**

ASA leaders are accountable for upholding the highest standards of ethical behaviour and fostering a culture of integrity where fraud and corruption is not tolerated, transparency and accountability is expected, and the workplace supports and empowers individuals to speak up when suspected fraud or corruption occurs.

### ASA Tolerance of Fraud and Corruption

The ASA does not tolerate any fraudulent or corrupt behaviour. The ASA acknowledges that it cannot avoid or prevent all fraud and corruption risks, which is why the agency is committed to implementing a contemporary and effective control framework to prevent, detect and respond to fraudulent and corrupt behaviour.

This means the ASA will take all reasonable measures to prevent, detect and respond to fraudulent and/or corrupt behaviour.

### Integrity

Acting with integrity means doing the right thing at the right time to deliver the best outcomes for Australia as sought by the government of the day.

ASA personnel must act with integrity when making decisions, reflecting the Australian Public Service Values as well as the values and behaviours underpinned by the ASA Nuclear Mindset principles, which shape the way the ASA thinks, acts and learns. At the heart of the Nuclear Mindset is recognising the special characteristics and unique hazards of the NPS Program and that leadership, professionalism, integrity and positive corporate behaviour is valued and rewarded.

Contractors, consultants and outsourced service providers are to demonstrate the same ethical standards by complying with the principles set out in this Plan, as well as the Defence and the Private Sector: Working with Integrity publication.







## 4. Key Roles and Responsibilities

### Director-General ASA

Director-General ASA is the **Accountable Authority** and responsible for governing the agency in a way that promotes the proper use of public resources. This includes taking all reasonable measures to prevent, detect and respond to fraud and corruption.

The Director-General ASA is also the delegated authority with obligations to refer corruption to the National Anti-Corruption Commission (NACC), under the *National Anti-Corruption Commission Act 2022* (NACC Act).

The Director-General ASA is the accountable authority for the ASA, with specific responsibilities under the Protective Security Policy Framework (PSPF).

### Chief Operating Officer

Chief Operating Officer is the delegated **Lead Authority** and is responsible for:

- fraud and corruption control in the agency, including:
  - assurance activities relating to integrity
  - promotion of ethical conduct and an ethical culture in ASA
  - conduct of fraud and corruption prevention and detection activities
  - fraud and corruption related debt recovery
  - the ASA conflicts of interest system of controls
  - maintaining a system that enables complete and accurate investigation-related data
- conducting fraud and corruption investigations, reviews and assessments including allegations of serious misconduct, lack of probity, commercial impropriety, collusive tendering, conflicts of interest, and corrupt practices committed by or involving ASA personnel
- functions, powers and duties under the NACC Act including:
  - the coordination and submission of all ASA mandatory referrals of serious and systemic corruption matters to the NACC
  - managing the coordination of ASA referrals or requests for information from the NACC.

The Chief Operating Officer is the ASA manager for the Memorandum of Understanding for the Provision of Shared Services between the Department of Defence and the ASA. This Memorandum of Understanding supports the shared services partnership where the ASA leverages Defence enterprise-level controls to assist to prevent and detect fraud and corruption against the agency.

### Assistant Director-General Corporate Governance

Assistant Director-General Corporate Governance is responsible for the delivery and implementation of ASA fraud and corruption control arrangements.

### Assistant Director-General Enterprise Security

Assistant Director-General Enterprise Security is designated the ASA Chief Security Officer (CSO), with specific responsibilities under the Protective Security Policy Framework. The Chief Security Officer has strategic oversight of protective security for the agency.

### Assistant Director-General Information Control

Assistant Director-General Information Control is designated the Chief Information Security Officer (CISO) and is responsible for cyber security in the ASA, including responsibility for security policies related to data and systems.

### Assistant Director-General Commercial

Assistant Director-General Commercial is responsible for providing procurement guidance to ASA delegates, decision-makers and ASA personnel to achieve value for money, effective and commercially sound decisions in accordance with relevant ASA and Defence policy and legislative requirements.





## Chief Risk Officer

Chief Risk Officer is responsible for maintaining the ASA's risk capability, providing advice to the agency's Senior Leadership Group on the ASA risk profile, and improving and maintaining the ASA Risk Management Framework.

## Chief Finance Officer

Chief Finance Officer is accountable for setting ASA's financial framework and ensuring that risks associated with ASA's appropriations and expenditure are addressed.

## Senior Leadership Group

Senior Leadership Group is responsible for promoting a culture of fraud and corruption awareness by ensuring that their teams understand and comply with relevant legislation, regulations, procedures, and policies.

In their areas of responsibility, members of the Senior Leadership Group are responsible for specific control arrangements, including considerations of fraud and corruption in the planning process, as well as the implementation and operation of governance arrangements.

## ASA personnel

All ASA personnel are expected to act with integrity and comply with relevant legislation, policies, Instructions and guidance.

ASA personnel include:

- Australian Public Servants engaged to assist the Director-General ASA
- seconded members from the Australian Defence Force whose services are made available to the Director-General ASA
- contractors, consultants and outsourced service providers who are providing services to the ASA
- personnel seconded from Australian or international partners who are providing services to the ASA.

In practice, this means:

- actively participating in mandatory Fraud and Integrity Awareness Training
- reporting incidents of suspected fraudulent or corrupt behaviour, and conflicts of interest
- assisting with the implementation strategies designed to prevent, detect and respond to fraud and corruption
- considering fraud and corruption risks associated with your work, and taking all reasonable steps possible to mitigate that risk
- not acting in a retaliatory, discriminatory or otherwise adverse manner towards any individual, on account of that individual making a genuine report of fraud or corruption
- not hindering, obstructing or impeding any investigation into suspected fraud or corruption
- providing assistance to the Chief Operating Officer in relation to inquiries and investigations into allegations of fraud and corruption.

## Managers and Commanders (at all levels)

In addition to the expectations of all personnel, Managers and Commanders are expected to:

- ensure subordinate personnel complete mandatory Fraud and Integrity Awareness training
- take action to appropriately manage any actual, potential or perceived conflict of interest in relation to subordinate personnel
- take appropriate action on any reports of suspected fraud, corruption or unethical behaviour, including matters which may constitute a Public Interest Disclosure
- provide resources and support to ensure that their fraud and corruption risks and controls are reviewed on a regular basis to maintain and mitigate current and emerging risks.

## Control Owners

Control Owners are responsible for managing the implementation and assessment of controls for specified fraud and corruption risks. Control Owners must ensure performance of their controls, including the effectiveness of the control, against their objectives and for reporting on control performance.

Control Owners are directly engaged by the ASA's Fraud and Corruption team for reviews of their control against identified risks. Control Owners report control implementation and effectiveness to Managers, Risk Owners (usually their Branch Head), as well as the ASA Fraud and Corruption team.





## 5. Fraud and Corruption Risk Environment

In accordance with the Commonwealth Fraud and Corruption Control Framework's Fraud and Corruption Rule, the ASA undertakes an agency-level fraud and corruption risk assessment biennially, or if there are substantial changes to ASA's structure or functions.

The risk assessment will identify and analyse existing, new and emerging fraud and corruption risks. These risks are monitored and, where appropriate, a targeted control plan is implemented.

### Key fraud and corruption risks to ASA

<b>Human Resources</b>	<ul style="list-style-type: none"><li>• Misleading or false information provided by ASA personnel, applicants or recruitment service providers to gain a financial or personal benefit</li><li>• Misuse of power or position to influence recruitment practices or decisions</li><li>• Personnel using their position for personal benefit</li><li>• Post-separation, former ASA personnel steal, misuse and/or gain (or provide to third-parties) unauthorised access to ASA information or systems.</li></ul>
<b>Corporate Information and Systems</b>	<ul style="list-style-type: none"><li>• Unauthorised access to, theft, misuse or disclosure of ASA information and/or Intellectual Property</li><li>• Provision of information or access to systems to external (malicious) actors.</li></ul>
<b>Corporate Funds</b>	<ul style="list-style-type: none"><li>• Fraudulent use of ASA allocated expense cards</li><li>• Fraudulent claims for entitlements or allowances</li><li>• Personnel using their position for financial benefit</li><li>• Fraudulent behaviour by ASA personnel or contractors involved in accounts management, including falsifying payroll accounts and records</li><li>• Fraudulent behaviour by external party during accounts payable transactions impacting ASA.</li></ul>
<b>Procurement and Contracting</b>	<p>Fraudulent and/or corrupt behaviour during procurement and contracting activities by ASA personnel and/or contractors, consultants and outsourced service providers who are providing services to the ASA; including:</p> <ul style="list-style-type: none"><li>• Undeclared conflicts of interest</li><li>• Misuse of power or position to influence procurement decisions</li><li>• Falsifying invoices for services not rendered</li><li>• Collusion by suppliers, including bid-rigging</li><li>• Bribery</li><li>• Provision of information by ASA personnel to favoured contractors</li><li>• Contract variation to increase costs or extend the scope of work without proper justification.</li></ul>
<b>Assets</b>	<p>Theft, misuse and/or misappropriation of, or unauthorised use of, ASA:</p> <ul style="list-style-type: none"><li>• ICT assets</li><li>• assets, vehicles or facilities</li><li>• stores, equipment and clothing.</li></ul>

Details of these key agency-wide risks and controls are documented in the 2025 ASA Fraud and Corruption Risk Assessment Register.

ASA consults with other entities where fraud and corruption risks impact on the responsibilities of the other entity in accordance with legislative obligations or powers relating to information sharing.





## 6. Preventing Fraud and Corruption

**Prevention controls are the most common and cost-effective way to stop fraud and corruption, as they prevent or limit the size of risk by reducing the likelihood and consequences of fraud and corruption.**

Key components of ASA fraud and corruption prevention approach include:

### Strong integrity culture

- Promote awareness of, and adherence to the APS Values and Code of Conduct.
- Promote awareness of, and adherence to ASA conflict of interest and probity requirements.
- Encourage and support a fraud and corruption reporting culture.

### Communication and education

- Completion of mandatory Fraud and Integrity Awareness training to build strong awareness of what fraud and corruption is, and how to report it.
- Engagement and education strategies to raise awareness about fraud and corruption, conflict of interest, gifts, benefits and hospitality.
- Information available on the ASA's intranet and internet on how to report suspected fraudulent or corrupt conduct and what support and protections are available.

### Governance, accountability and oversight

- Implementation of legislative obligations through policies, governance frameworks, procedures and guidance documents.
- A contemporary risk management framework that identifies and appropriately mitigates fraud and corruption risks.
- Audit and assurance activities including a risk based approach to control testing to ensure controls remain effective.

### Personnel controls

All ASA personnel, contractors, consultants and outsourced service providers are subject to on-boarding and off-boarding processes which are supported by preventative controls such as education, policies and system level controls.

### Security clearance

- Robust recruitment and security vetting processes, including screening and on-boarding processes
- All ASA personnel to hold, and maintain, a Commonwealth security clearance
- Embedded system and access controls
- Data matching
- Application of a comprehensive information security framework, based on the Protective Security Policy Framework and adherence to the Defence Security Principles Framework.

### Conflicts of Interest Management

Conflicts of Interest management, including declarations and development of agency guidance, is a key fraud and corruption control strategy for the ASA. The Australian public rightly expects public officials and agencies to be fair, impartial and to act in the public interest. Failure to address conflicts of interest can erode the legitimacy of the ASA's function, brand and reputation, and give the impression that the ASA is not acting in the public interest.

All ASA personnel need to be aware of their obligations to manage and declare any conflicts of interest, whether they be actual, potential or perceived. This also applies to personnel seconded to the ASA.

The Conflict of Interest Policy provides guidance to ASA personnel on how to declare and manage conflicts of interest. Where a conflict of interest might be identified, all ASA personnel must:

- obtain approval before (and notify AGSVA) engaging in secondary employment
- discuss with their manager, and document via the online Conflict of Interest Declaration AF220 (online) Defence form, any actions to manage a potential, perceived or actual conflict of interest
- submit a Conflict of Interest Declaration (AF220) when they are a member of a tender





evaluation panel or a recruitment panel, comprising either:

- a positive affirmation of no conflict of interest, or
- a declaration of an actual, potential or perceived conflict of interest.

Where a decision-maker has determined a conflict of interest exists, an appropriate management strategy must be implemented to mitigate any risk. Mitigation strategies can include placing restrictions on the level or type of decision that can be made, removal of an individual from an activity, or an individual recusing themselves from an activity.

Members of the Senior Leadership Group, as well as members of the ASA Audit and Risk Committee, must provide an annual declaration of interest.

Contractors, consultants and outsourced service providers (including members of the ASA Audit and Risk Committee) must adhere to the conflict of interest obligations outlined in their contract.

### Post-separation employment

All ASA personnel must declare any offer of post-separation employment with a prospective employer that could lead to an actual, potential or perceived conflict of interest as soon as practicable, and prior to accepting the offer.

Security exit interviews are conducted for all departing ASA personnel to remind them of their enduring obligation to protect ASA and NPS Program information.

ASA personnel may also need to apply for a foreign work authorisation when working for, or on behalf of, a foreign military or government body, as required under the *Safeguarding Australia's Military Secrets Act 2024*. The requirement for a foreign work authorisation strengthens Australia's security by preventing individuals from disclosing or exploiting classified military or related information.

### Information Controls

In line with the Australian Government Protective Security Policy Framework, ASA takes a systematic approach to ICT security risk management, network usage and detection capabilities.

The Defence Security Principles Framework and the security classification system contained within, allows ASA to share and exchange information with confidence by ensuring a common recognition of confidentiality requirements and the consistent application of protective security measures.

A range of assurance initiatives help ensure the integrity of data and information management across the ASA.

### Financial Controls

The ASA maintains a set of financial controls to ensure a true and fair view of the ASA's financial performance, position and proper use and management of public resources, consistent with the *Public Governance, Performance and Accountability Act 2013* (PGPA Act).

### Procurement and Contracting Controls

The ASA applies due diligence and probity controls to all stages of the procurement and contracting life cycle. Probity controls are tailored according to the scope, scale and risk of activities and align to the Commonwealth Procurement Rules, Defence procurement and contracting policies, the Defence Commercial Framework and the ASA Procurement and Contracting Guidelines.

System controls within the My Procurements application reduce instances of non-compliance, and deter fraud and corruption through the systemised capture and reporting of procurement decisions and approvals.

ASA undertakes a range of audit and assurance activities to ensure all ASA personnel, suppliers, including contractors, consultants and outsourced service providers, undertake procurement and contracting activities in accordance with these policies and frameworks, and *Defence and the Private Sector: Working with Integrity*.

### Asset Controls

ASA maintains comprehensive asset registers and inventory management systems. To govern these systems, ASA undertakes regular stocktakes in relation to both assets and inventory to ensure appropriate maintenance, accountability and early identification of loss or theft.





## 7. Detecting Fraud and Corruption

**Detection fraud controls can help identify when fraud has occurred, disrupt additional fraud and reduce the consequences.**

While detection controls are not as cost effective as prevention controls, fraud and corruption that is detected early will significantly reduce the impact.

Measures to detect internal and external fraud and corruption include:

- mechanisms to report allegations of fraud and corruption (see the section immediately below)
- system monitoring and scanning including detection analysis
- periodic review of fraud and corruption control effectiveness
- post-transactional reviews to identify altered or missing documentation, or falsified authorisation, that may identify fraud or corruption in high risk activities
- mandatory reporting of suspected and/or actual fraud and corruption
- internal and external audits
- intelligence sharing and collaborating across the Defence Portfolio, law enforcement, Commonwealth and relevant entities.







## 8. How to Report Allegations of Fraud and Corruption

**ASA classifies fraudulent or corrupt behaviour, actual or suspected, as a Notifiable Incident under Defence Instruction - Administration and Governance Provision 4: Incident Reporting and Management.**

All ASA personnel, contractors, consultants and outsourced service providers must report suspected fraud and corruption.

Anyone, including ASA personnel and the public, can report suspected fraud and corruption. Reports can be made via the ASA website ([www.asa.gov.au](http://www.asa.gov.au)), the ASA Periscope Integrity Reporting intranet page, or via email [asa.fraudandcorruption@defence.gov.au](mailto:asa.fraudandcorruption@defence.gov.au)

### Public Interest Disclosure

A Public Interest Disclosure (PID) is a mechanism for public officials to disclose suspected wrongdoing, including fraud or corruption. The *Public Interest Disclosure Act 2013* (PID Act) provides protections for disclosers and legal remedies to address reprisal action taken against them as a result of making a disclosure. If the disclosure meets PID criteria, the discloser will receive immunity from civil, criminal or administrative liability. The PID Act also requires supervisors to give information to an Authorised Officer if they receive information about suspected wrongful conduct.

In ASA, public officials include current and former Australian Public Service employees, Australian Government employees not employed under the *Public Service Act 1999*, Australian Defence Force members, contracted service providers (and anyone employed by them), and statutory officers.

The PID Act provides broad protections for those making or intending to make a Public Interest Disclosure. All reasonable efforts are made to protect a discloser's identity. With limited exceptions, the PID Act makes it an offence for a person to use or disclose identifying information of a discloser.

Disclosures can be made to an ASA Authorised Officer via email ([asa.pid@defence.gov.au](mailto:asa.pid@defence.gov.au)), or in person. Further information on PIDs can be

found on the ASA Integrity Reporting Periscope intranet page, and the ASA website.

### National Anti-Corruption Commission (NACC)

The NACC Act includes mandatory reporting obligations on the ASA's Accountable Authority (the Director-General ASA) to report all cases of suspected serious or systemic corruption to the NACC.

Any person (including members of the public and public officials) can choose to report instances of serious or systemic corruption to the NACC as a voluntary referral. However, the NACC may choose not to investigate a corruption issue and, in those cases, may refer matters back to the ASA.

There are protections provided for whistle-blowers and witnesses who provide information to the Commission. Please consult the [NACC website](#) for further details.

### Foreign Bribery

Foreign bribery is the bribery of a foreign public official. It is a serious criminal offence that carries heavy penalties.

The Australian Government has a zero tolerance approach to foreign bribery and other forms of corruption and strongly discourages companies from making facilitation payments.

If ASA personnel suspect bribery of a foreign public official may have occurred, this must be reported. The ASA will refer allegations of suspected bribery to the Australian Federal Police.

Reports can be made via the Fraud and Corruption Reporting forms, or email: [asa.fraudandcorruption@defence.gov.au](mailto:asa.fraudandcorruption@defence.gov.au)





## 9. Responding to Fraud and Corruption

**Any alleged fraudulent or corrupt behaviour that is reported or detected by ASA will be handled appropriately with consideration to the nature and seriousness of the allegation.**

### Investigating fraud and corruption

The Chief Operating Officer is the lead authority for the investigation of fraud and corruption allegations for the ASA. Reported cases of fraud and corruption are assessed and where appropriate will be investigated in accordance with the Australian Government Investigation Standard (2022).

Where matters involve potential serious or complex matters, they may be referred to external agencies such as the Australian Federal Police, the NACC, or Defence Investigative Authorities. Defence Investigative Authorities can include: the Commander Joint Military Police Unit; the Assistant Secretary Investigations and Public Interest Disclosures, Defence Integrity Division; the Assistant Secretary Security Threat and Assurance, Defence Security Division; and the Director Conduct and Performance, Defence People Group.

### Investigation outcomes

There are a number of outcomes that may result from a fraud or corruption investigation. Depending on the circumstances of the case, ASA may take administrative or disciplinary action in parallel with, or as an alternative to, a criminal prosecution. Decisions are guided by a range of legislative and ASA requirements, as well as Commonwealth policy such as the Prosecution Policy of the Commonwealth.

ASA takes all reasonable measures to recover fraud and corruption losses, including formal proceeds of crime action, civil recovery processes and administrative action.

Where a contractor, consultant or outsourced service provider has committed fraud, the ASA will consider contractual actions such as financial penalties, contract renegotiation or termination. Administrative actions, such as declining future engagements will also be considered.

In cases where an investigation has identified control gaps, opportunistic non-compliance or opportunities for improvement, ASA will review and update the relevant controls where appropriate.





# 10. Recording and Reporting Requirements

**All reports of fraud and corruption, together with details on the management of those matters, including activities, critical decisions and outcomes, are recorded in the Defence Enterprise Resource Planning (ERP) Case Management Solution (DECMS).**

Regular reporting and monitoring provides assurance over the effectiveness of the agency's control arrangements in preventing, detecting and responding to fraud and corruption.

## Internal Reporting

### **ASA Executive Committee (annually, or as required)**

Provides oversight of ASA's current and emerging key fraud and corruption risks and the ASA Fraud and Corruption Control Program.

### **ASA Audit and Risk Committee (annually, or as required)**

Provides oversight of the ASA in accordance with section 45 of the PGPA Act. The Committee provides written advice to the Director-General on the ASA's management of key risks, including control arrangements to detect, capture and effectively respond to fraud and corruption risks consistent with the Commonwealth Fraud and Corruption Control Framework.

### **ASA Annual Report (annually)**

The Director-General as the Accountable Authority provides:

- certification of compliance with section 10 of the *Public Governance, Performance and Accountability Rule 2014* (PGPA Rule), which deals with preventing, detecting and dealing with fraud and corruption
- a statement of any significant fraud and corruption issue reported to the Minister for Defence and Minister for Finance in accordance with section 17AG of the PGPA Rule

## External Reporting

### **Minister for Defence and Minister for Finance (annually or as required)**

The ASA Accountable Authority reports significant fraud and corruption incidents, their management and the outcomes of criminal prosecutions to the Minister for Finance in accordance with section 19 of the PGPA Act.

### **Australian Institute of Criminology (annually)**

The ASA provides information on fraud and corruption metrics to inform the Australian Institute of Criminology's annual Fraud against the Commonwealth census, in accordance with the *Commonwealth Fraud and Corruption Control Policy 2024*.

### **Commonwealth Ombudsman (annually)**

The ASA provides Public Interest Disclosure metrics in accordance with the PID Act.

### **National Anti-Corruption Commission (annually)**

The NACC's annual Commonwealth Integrity Survey provides all ASA personnel an opportunity to provide anonymised feedback on integrity and corruption issues. The NACC provides agency heads with their individual reports, as well as describing broad trends and insights affecting Commonwealth entities.





# 11. Legislation and Policy

## Legislation

- *Public Governance, Performance and Accountability Act 2013*
- *National Anti-Corruption Commission Act 2022*
- *Public Interest Disclosure Act 2013*
- *Public Service Act 1999*
- *Criminal Code Act 1995*
- *Defence Amendment (Safeguarding Australia's Military Secrets) Act 2024.*

## Commonwealth Fraud and Corruption Control Framework 2024

The Commonwealth Fraud and Corruption Control Framework 2024 supports the ASA to effectively manage the risks of fraud and corruption. The Framework sets out the minimum standards to manage the risk and incidents of fraud and corruption as per section 10 of the PGPA Act. The Framework sets out the procedural requirements that must be implemented (including investigations and reporting), as well as providing practical guidance on fraud and corruption control arrangements.

## ASA Accountable Authority Instructions

Accountable Authority Instructions (AAI), under section 20A of the PGPA Act, supplement the application of the PGPA framework (PGPA Act and the PGPA Rule) within ASA.

### Accountable Authority Instruction 1

Managing Risk and Accountability outlines arrangements and key accountabilities for risk management and fraud and corruption control in ASA.

## Resources

- ASA Nuclear Mindset
- Australian Government Investigations Standard (2022)
- Australian Public Service Commission (Integrity)
- Australian Public Service Values, Code of Conduct and Employment Principles
- Defence Procurement Framework
- Defence Procurement Complaints Scheme
- Defence Security Principles Framework
- Defence and the Private Sector: Working with Integrity
- Australian Government Protective Security Policy Framework
- ASA Public Interest Disclosure Scheme.





## 12. Contact us

### **ASA personnel, contractors, consultants and outsourced service providers must report suspected fraud and corruption.**

Anyone, including ASA personnel and members of the public can report suspected fraud and corruption, via:

- the ASA Integrity Reporting page on Periscope
- the ASA website, [www.asa.gov.au](http://www.asa.gov.au)
- email: [asa.fraudandcorruption@defence.gov.au](mailto:asa.fraudandcorruption@defence.gov.au)
- phone: 02 6214 4677

### **Public Interest Disclosure**

- ASA website: [www.asa.gov.au/about/public-interest-disclosure](http://www.asa.gov.au/about/public-interest-disclosure)
- the ASA PID Periscope intranet page, for ASA staff
- e-mail: [asa.pid@defence.gov.au](mailto:asa.pid@defence.gov.au)

### **Contact details**

For further information on the *ASA Fraud and Corruption Control Plan 2025-27*, contact [asa.fraudandcorruption@defence.gov.au](mailto:asa.fraudandcorruption@defence.gov.au)







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