



BETTER PRACTICE for policy design

- Accept that fraud is likely to occur, and plan appropriately
- Consider potential fraud vulnerabilities early and throughout the design process (see: Red Flags for Policy Design)
- Design policies that encourage compliance and mitigate the risk of fraud
- Discuss potential fraud vulnerabilities in the policy with an experienced fraud control officer
- Build requirements for creating and using countermeasures into the policy framework
- Include the requirement to test the effectiveness of the countermeasures into the policy framework
- Include potential data collection and sharing arrangements into the policy framework
- Design the policy in conjunction with a program area that has delivered a similar program, to share lessons learnt
- Provide fraud awareness training to policy staff

BETTER PRACTICE for program delivery

- Accept that fraud is likely to occur, and deliver the program with this in mind
- Maintain an understanding of the existing countermeasures
- With the assistance of a fraud control officer, test the effectiveness of the existing countermeasures
- If creating a new IT system to manage the program, request the ability to digitally segregate roles/approvals and restrict access to sensitive information
- Be aware that fraud countermeasures can be breached, and therefore it is important to have clear response protocols in place
- Consider related data that could be shared or collected to increase the effectiveness of the fraud countermeasures
- Meet with other programs and policy makers to share lessons learnt and raise fraud awareness
- Provide fraud awareness training to program staff
- Ensure program staff understand red flags and how to report a suspected fraud incident