



9 October 2017

Mr. Stephen O'Bryan QC
Commissioner
IBAC
GPB Box 24234
Melbourne VIC 3001

Dear Mr O'Bryan,

Reference: CD/16/47041 – Operation Denmark

I write to you in response to your letter dated 29 March 2017 and the Greater Metropolitan Cemeteries Trust (GMCT) note the Independent Broad-based Anti-corruption Commission's (IBAC) findings and recommendations as a result of Operation Denmark.

GMCT has taken the following action in relation to each IBAC recommendation:

IBAC Recommendation	GMCT action
That GMCT review and strengthen its policies and procedures to address the identified corruption vulnerabilities, to ensure:	<p>GMCT has revised its Gift, Benefit and Hospitality Policy to align with the Victorian Public Sector Commission Gifts, Benefits and Hospitality Framework.</p> <p>The revised policy:</p> <ul style="list-style-type: none"> • requires all offers to be declared, • refusal of cash offers, • refusal of non-token offers (greater than \$50) unless approved due to legitimate business reason and does raise a conflict of interest, • all offers to be declared • the Gifts, Benefits and Hospitality Register of non-token gifts will be published on the GMCT website; and • requirement to report on
<p>a. All staff are aware of their obligation to declare all offers of gifts, benefits and hospitality (noting the exceptions in the policy), and the requirement to report all actual or suspected instances of corruption</p>	
<p>b. Customers and potential customers are aware that staff are unable to accept cash (regardless of value) or gifts and benefits valued at more than \$50, and that all offers will be reported, and that consideration is given to communicating effectively with members of the public whose first language is not English</p>	

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IBAC Recommendation	GMCT action
	<p>offer considered a bribe or inducement.</p> <p>Our Leadership Team has been trained on the revised policy, who have in turn held information sessions with their respective teams.</p> <p>The Gift, Benefit and Hospitality Policy is available of the GMCT website for public access and suppliers have been advised of the revised policy.</p>
<p>c. The basis for grave allocation at all GMCT cemeteries is clearly documented</p>	<p>GMCT has drafted a new Sales Policy which introduces specific controls around the allocation of plots. This policy will be finalised by the end of October 2017.</p>
<p>d. The Fraud and Corruption Control Plan is current, robust and addresses the risk of bribery in relation to the allocation of graves.</p>	<p>The Fraud & Corruption Control Plan will be updated to include the risk of bribery and grave allocation by December 2017.</p>
<p>e. Consideration is given to recording incoming telephone calls to GMCT to reduce the risk of bribes and to assist identification of such activity.</p>	<p>GMCT will introduce telephone recording for our Contact Centre and this initiative has been incorporated into our Contact Centre upgrade project and scheduled for 2017.</p>

Please contact me on [REDACTED] if I can be of any further assistance.

Yours sincerely,



Jacqui Weatherill
Chief Executive Officer