FRAUD AND CORRUPTION POLICY

INTRODUCTION

PURPOSE
The objective of this policy is to protect against, detect and respond to fraud and corruption in order to protect the interests of project beneficiaries, volunteers and other stakeholders while retaining a high ethical standing within the community for Beyond Charity.

SCOPE
This policy applies to all Directors, employees, volunteers, contractors, project partners and consultants in relation to their work with/for Beyond Charity.

POLICY STATEMENT
Beyond Charity cannot and will not tolerate fraud or corruption.

This policy will be advised to all project partners and others involved in the implementation of any project. Any perceived or actual fraud or corrupt conduct may result in the immediate cessation of funding or support of any Beyond Charity project or activity.

Every dollar taken by theft or fraud reduces the capacity to maintain the same level of services to people in need.

Reputational damage arising from fraud or corruption can lead to a significant decline in confidence in Beyond Charity and have an adverse impact on donations and funding, leading to a more severe impact on the services we deliver.

It is in everyone's interests to prevent fraud and corruption from occurring and to report every suspected incident immediately to the Directors, Board Chair, or Auditors as appropriate.

DEFINITIONS
Terms used in this policy are:

Fraud: Dishonestly obtain or arrange a benefit by deception or other means.

Examples include:

- Theft such as stealing property, petty cash, gift cards, donations, client funds or corporate assets;
- Falsification of records, accounts or documents to deceive;
- Inappropriate or unsupported / unjustifiable facilitation payments;
- Dishonestly destroying or concealing accounts or records;
- Embezzlement or misappropriation of funding or other assets;
- Misuse of assets or property for personal benefit; and
- Forgery or issuing false or misleading statements with intent to obtain financial advantage or deceive.

Corruption: Dishonestly obtain a benefit by misuse of power, position, authority or resources.

Examples include:

- Bribery, extortion & blackmail;
- Secretly permitting personal interests to override Beyond Charity interests;
- Secretly giving or accepting gifts & benefits in return for preferential treatment to the giver;
- Collusion, false quotes, false invoices or price fixing;

- Inappropriate or unsupported / unjustifiable facilitation payments;
- Manipulating design & specifications or processes for personal gain or to conceal defects;
- Complicity in excessive billing or submission of false support documents or concealment of documents;
- Falsifying job qualifications or work or safety certifications;
- Nepotism (favouring relatives); and
- Privacy breaches or data manipulation with intent to cause harm.

RESPONSBILITIES

Everyone is responsible for fraud control and corruption prevention.   Accordingly, every person must report every suspected incident.

Board – Directors & Chair

- Set the ethical 'tone at the top' to flow throughout Beyond Charity to entrench a culture of high ethics and integrity,
- Approve terms of reference for any investigation into fraud or corruption, and
- Approve or endorse final action to be taken in response to actual incidents of fraud or corruption
- Oversee daily operations in which fraud or corruption risks may arise,
- Be actively involved in planning activities to prevent, detect and respond to suspected fraud and corruption incidents.
- All stakeholders (Directors, executives, managers, employees, volunteers, contractors & consultants regardless of whether full time, part time, casual or non-remunerated etc.):
- Be continually alert to the possibility of fraud or corruption incidents and to internal control lapses.
- Report any suspected incidents or control lapses or weaknesses.
- Not engage in any fraudulent or corrupt conduct.

External Audit

- Maintain an awareness of the possibility of fraud or corruption when conducting their audit.
- Notify the Board if incidents of fraud or corruption are identified

APPLICATION

Beyond Charity is committed to minimising fraud and corruption and instilling a culture of:

- 'Zero tolerance' of fraudulent and corrupt behaviour;
- Inquiring and investigating all suspected fraud and corruption tip-offs regardless of source or if made anonymously;
- Recovery of losses sustained through acts of fraud or corruption through all available avenues;
- Reporting all incidents of fraud or corruption to external parties as appropriate.

Prevention - Preventative measures include:

- Regular review of the integrity framework supporting a culture of integrity and intolerance of fraud or corruption
- Awareness training and education
- Risk assessments as part project risk assessments
- Continual quality improvement reviews of internal control and compliance measures
- Pre-employment screening (including   volunteers, contractors and consultants, where appropriate)

Detection - Detective measures include:

- Fraud & corruption detection programs such as independent project reviews
- Whistleblower protection
- Discovery during grievance management
- External audit awareness during audits

Response - Response measures include:
- Revision and refreshment of policies to rectify deficiencies
- Maintenance of an internal investigative capability including qualified
- Internal reporting of outcomes and escalation where appropriate
- Review of internal controls after every confirmed incident
- Application of disciplinary procedures for detected incidents
- Civil action to recover losses where appropriate
- Referral to external organisations and agencies, such as Police, as appropriate.

BREACH
A breach of this Policy may result in disciplinary action that may involve severance from any involvement with Beyond Charity.