

Fraud Prevention Policy



<u>1.</u>	<u>Purpose</u>	<u>3</u>
<u>2.</u>	<u>Policy Statement</u>	<u>3</u>
<u>3.</u>	<u>Review</u>	<u>3</u>
<u>4.</u>	<u>Authorisation</u>	<u>3</u>
	<u>Procedure Fraud Prevention</u>	<u>4</u>
<u>5.</u>	<u>Review</u>	<u>5</u>
<u>6.</u>	<u>Authorisation</u>	<u>5</u>

Applies to: Staff & Volunteers

Specific responsibility: Finance Manager

Policy context This policy relates to:

Standard:

Finance

Legislation or other requirements:

Public Interest Disclosure Act 2013 (Cwlth)
Crimes Act 1900 No. 40
Corporations Act 2001 (Cth)
Australian Securities and Investments Commission Act 2001 No. 51
Charitable Fundraising Act 1991 No. 69

1. Purpose

This policy aims to prevent, detect and investigate all forms of fraud and corruption at Coast Shelter.

Coast Shelter aims to establish an environment in which fraudulent or corrupt conduct is not tolerated, as well as one in which Board members, employees and volunteers do not act dishonestly.

2. Policy Statement

Coast Shelter shall develop and maintain a culture of honesty and integrity and implement processes that ensure the effective prevention, detection and management of fraud and corruption. Coast Shelter has adopted a zero-tolerance approach to fraud and corruption in all organisation activities, which is consistent with the Code of Conduct and the law.

Coast Shelter’s fraud and corruption policy is aligned with the Coast Shelter Code of Conduct, which requires ethical practices that are consistent with professional standards that provide the foundation for all services and programs.

3. Review

Reviewing and approving this policy		
Frequency	Person responsible	Approval
Biannually	Finance Manager	Chief Executive Officer

4. Authorisation

VERSION	APPROVAL	REVIEW DATE
Version 03	16 March 2022  Michael Starr, Chief Executive Officer	March 2024

Procedure Fraud Prevention

Applies to: Staff & Volunteers
Specific responsibility: Finance Manager

The following procedure can be implemented to enact this policy:

1. Coast Shelter defines fraud as ‘the theft or misuse of funds or other resources, by an employee or a third party, which may or may not also involve alterations of financial documents or records to conceal the theft or misuse’.
2. Fraud includes but is not limited to
 - the theft of funds or any other Coast Shelter property
 - the falsification of costs or expenses
 - the forgery or alteration of documents
 - the destruction or removal of records
 - the inappropriate personal use of Coast Shelter’s assets
 - employees seeking or accepting cash, gifts or other benefits from third parties in exchange for preferring the third parties in their dealings with Coast Shelter
 - blackmail or extortion
 - the payment of excessive prices or fees to third parties with the aim of personal gain.
3. All Coast Shelter employees are accountable for—and play a role in—fraud and corruption control. Any staff member who suspects fraudulent or corrupt activities will follow the procedures outlined in the Coast Shelter Whistleblower Policy.
4. Coast Shelter will regularly review its policies and procedures to ensure that they provide an adequate framework for proper workplace conduct.
5. All workers must be familiar with Coast Shelter’s policies and procedures, and they must sign their acknowledgement of Coast Shelter’s Code of Conduct.
6. Coast Shelter will undertake a risk management assessment process that includes a risk assessment relating to fraud and corruption on at least an annual basis. A risk management plan will be developed to remove or reduce any identified risks.
7. All Coast Shelter staff must immediately report any suspected fraud or corrupt conduct to their supervisors. Senior managers must ensure that all cases of suspected fraud and corrupt conduct are reported to the person identified by the Board as responsible for managing these reports.
8. Any employee who reports suspected fraud is protected by Coast Shelter through the Code of Conduct and the protections afforded by the *Public Interest Disclosures Act 2013* (Cwlth).
9. The obligation to refer criminal matters to the NSW Police is contained in Section 316 of the *Crimes Act 1900* (NSW). If an employee is reasonably believed to have committed a criminal offence, the matter should be referred to the NSW Police.
10. Alleged or suspected corrupt conduct is investigated by the Coast Shelter Chief Executive Officer or other appropriate staff, or it is referred to an external agency for investigation.

11. Investigations will consider what improvements can be made to Coast Shelter’s policies and procedures.
12. The Coast Shelter executive maintains a confidential database of all suspected fraud and corrupt activities.
13. When Coast Shelter has suffered loss, full restitution will be sought in relation to any benefit or advantage that has been obtained. The recovery of costs will be sought from the individual(s) or organisations responsible for the loss.

If the individual or organisation cannot, or will not, make full restitution of the loss, then consideration will be given to taking civil legal action to recover the loss. This is in addition to any ensuing criminal proceedings. The final decision regarding whether to prosecute or not lies with the Board of Management.

5. Review

Reviewing and approving this policy		
Frequency	Person responsible	Approval
Biannually	Finance Manager	Chief Executive Officer

6. Authorisation

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