



Fraud and Corruption Policy

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Applies to:	This policy applies to all employees, volunteers and members of the Board of Coast Shelter (collectively referred to as Team members in this Policy)
Specific Responsibility:	Chief Executive Officer

Policy Context – This policy relates to:	
ASES Standard:	2.1 Sound Governance 2.2 Policy and Procedures 2.4 Risk Management
ACNC Governance Standard	Governance Standard 5 – Duties of Responsible People
Legislation or other requirements:	Corporations Act 2001 (Cth) Australian Charities and Not-for-profits Commission Act 2012 (Cth) Australian Charities and Not-for-profits Commission Regulations 2022 (Cth) Charitable Fundraising Act 1991 No. 69

Purpose

The purpose of this Fraud & Corruption Policy is to assist in the prevention and detection of all forms of fraud and corruption should it occur at Coast Shelter. This policy seeks to ensure all Coast Shelter team members are aware of their responsibilities and reporting processes regarding the identification and prevention of fraudulent activity.

Policy Statement

Coast Shelter will not tolerate any form of fraudulent or corrupt conduct and will take all steps if fraud or corrupt conduct is detected to refer the matter immediately to the Police and any other relevant corruption agency.

Coast Shelter will investigate any suspected acts of fraud, misappropriation, or other similar irregularity. An objective and impartial investigation, as deemed necessary, will be conducted regardless of the position, title, length of service or relationship with the organisation of any party who might be the subject of such investigation.

Any fraud or corruption sustained shall constitute grounds for dismissal. Any case of fraud, whether suspected or proven, shall be reported to the relevant and appropriate authorities such as the police and other relevant corruption agencies.

All Coast Shelter team members are obliged to report suspected fraud related to their operations.

Any Coast Shelter team members who suspects the commission of a fraud, related to the operations of Coast Shelter, is required to immediately report it to a manager / appropriate person in authority within Coast Shelter including the CEO or if involving the CEO to the Chair of the Board.

All suspected fraud or corruption must be reported to the CEO (unless the CEO is subject to the inquiry then to the Chair of the Board) at the earliest opportunity.

Definitions

Fraud and corruption 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.

Responsibilities

All Coast Shelter Coast Shelter team members are accountable for – and play a role in – fraud and corruption control.

Position	Responsibilities
Coast Shelter Board of Directors	• Assume ultimate responsibility for the prevention and detection of fraud • Ensure appropriate and effective internal control systems are in place.
CEO	• Responding to and investigating instances of fraud reported to them
People & Culture Manager	• Regularly review policies and procedures to ensure that they provide an adequate framework for proper workplace conduct. • Perform a risk management assessment process that includes a risk assessment relating to fraud and corruption on an annual basis. A risk management plan will be developed to remove or reduce any identified risks.

People Managers	• Be aware of the types of improprieties that might occur within their area of responsibility and be alert to any indications of such conduct. • Assess the risk of fraud within their area of control. • Educate team members/volunteers/contractors about fraud prevention and detection. • Facilitate the reporting of suspected fraudulent activities.
All team members	• Read and ensure they understand Coast Shelter's policies and procedures and they must sign their acknowledgement of Coast Shelter's code of conduct. • All team members/volunteers/contractors have the responsibility to prevent and report suspected fraud.

Reporting

Any Coast Shelter team members who suspect fraudulent or corrupt activities will follow the procedures outlined in the Coast Shelter Whistleblower Policy and Procedures.

Any Coast Shelter team members who report suspected fraud is protected by Coast Shelter through their Code of Conduct and the *Public Interest Disclosures Act 2013 (Cth)* otherwise known as Whistleblower protection.

Investigations

When suspected fraud or corruption is reported the CEO will commence an investigation into the issues subject to notification to identify any actual fraud or corruption.

The way the investigation is conducted i.e. internal fact finding or external independent investigation is a decision for the CEO.

Should actual fraud or corruption be identified the CEO will ensure any notifications are made to the Police and any other relevant stakeholder (i.e ACNC etc).

Any investigation should consider any improvements that could be made to the policies and procedures at Coast Shelter. All investigations must address the opportunities within the final investigation report.

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 criminal proceedings that may be taken by Police.

The final decision regarding whether to prosecute or not lies with the Police and Coast Shelter Board. In making this decision regard should be had for the high burden of proof in criminal proceedings.

Any person reporting a fraud, or a suspected fraud, shall not be penalised for raising a concern of this nature. Any person who does not report any suspicion of fraud will be dealt with for misconduct under our Code of Conduct policies and procedures.

Review

Reviewing and approving this policy		
Frequency:	Person Responsible	Approval
Biennially	Finance Manager	CEO

Authorisation

Version	Approval	Review Date
V04	15 February 2024 Board	February 2026