

BRANCH POLICY STATEMENT 1.07

ANTI-FRAUD POLICY

1. PURPOSE

ADAVB is committed to the detection, prevention, response and reporting of any instances of fraud within its operations. Fraudulent acts could result in significant, negative impacts on individuals, the organisation (reputationally and operationally) and our members.

As we continuously strive to maintain the integrity and reputation of ADAVB, It is incumbent upon anyone working for or on behalf of the organisation to be aware of their responsibilities in the event of a fraudulent event and/or corrupt conduct.

This Policy is not intended to be contractual in nature.

2. SCOPE

This policy applies to all entities within ADAVB and to all employees, volunteers, contractors and consultants in relation to their work with/for ADAVB (which for the purposes of this policy will be referred to as employees).

3. DEFINITIONS

Fraud

Fraud is an intentional act of deception intended to secure an unfair or unlawful gain or benefit. Examples of fraud within the context of ADAVB include:

- Theft in any form – Stealing office-based equipment/assets, petty cash, membership funds, or theft from another individual within the workplace.
- Falsely creating records or submitting fabricated invoices for payment in an attempt to deceive. Examples include – claiming personal expenses or making other types of false expense claims.
- Dishonestly destroying or concealing records/information with the intent of obtaining a financial advantage or deceiving the organisation.
- Colluding with external third parties to gain an unfair or financial advantage (e.g., Signing or supporting contracts for spend where an individual gain is made at the expense of the organisation).

(Please note that the above list is not exhaustive)

Corruption

Corruption is where an individual (or group of individuals) uses their power and/or responsibilities/access within the organisation to dishonestly obtain a benefit. Examples of corruption include:

- Bribery, extortion & blackmail.
- The giving or acceptance of gifts, gratuities, entertainment, and/or other benefits in return for favourable treatment.
- Being complicit with respects to corrupt acts (e.g., Knowledge of excessive billing; Concealing documents; and the wilful provision of false/misleading information).
- Making decisions based on personal circumstances (e.g., Hiring decisions that benefit a friend, family member, or where a benefit may be realised immediately or into the future) versus what's best for the organisation.
- Breaches of privacy with the intent to cause harm to the organisation or staff working for the organisation.

4. RESPONSIBILITIES

Employees' Responsibilities

All employees must:

- Comply with this policy.
- Observe all directions from ADAVB regarding this policy.
- Responsible for fraud control and corruption prevention. This is achieved as every person must take responsibility to understand the Code of Conduct and to report suspected incidents immediately.

Managers

All Managers must act:

- In accordance with the expected actions and intent outlined in this policy.
- To review potential areas of exposure within their areas of responsibility, conducting risk assessments on a periodic basis.
- Immediately respond to any breaches or suspected breaches of this policy, ensuring communication with the CEO to determine the appropriate response.

CEO

The CEO acts to:

- Set the right cultural tone in support of the expected ethical behaviour and standards within ADAVB.
- Review each breach to determine the appropriate course of action.
- Approve terms of reference for any investigation of suspected fraud or corruption.
- Review, approve and/or endorse the action(s)/response to any investigation undertaken.

ADAVB Council

The Council in consultation with the Management Team are responsible for setting this policy (and subsequent review) with the ethical principles that underpin it.

5. POLICY

ADAVB aims to maintain an environment free of any fraud, fraudulent acts, and/or corruption. This includes the requirement for all ADAVB employees to adhere to the organisation's Code of Conduct.

Suspected case of fraud within ADAVB should be reported immediately, irrespective of whether it is known who may be responsible (for the fraud) or how it may have occurred. All cases must be reported to the employee's direct manager in first instance who will understand the issue, and then prepare a report and/or communicate the case with the CEO.

All potential fraud cases will be assessed by the CEO for the appropriate actions to be taken. This may or may not involve a formal investigation (depending on the circumstances). In the event that an investigation is required, the CEO will appoint the investigator, provide a scope for the investigation and ensure confidentiality (individual rights protected throughout the process).

The CEO will communicate all cases of fraud and fraudulent activity to the ADAVB Council.

At the conclusion of the investigation, if there is sufficient evidence to suggest that a case of fraud or fraudulent activity exists that may be considered a criminal offence, the CEO may refer the matter together with the relevant information to the authorities.

6. BREACH OF THIS POLICY

ADAVB reserves the right to vary, replace or terminate this policy from time to time.

Employees must comply with this policy at all times.

If an employee is found to have breached this policy, they may be subject to disciplinary action. The type and severity of the disciplinary action will depend upon the circumstances of the case and the seriousness of the breach. In serious cases, this may include termination of employment.

Agents or contractors (including temporary contractors) of ADAVB who are found to have breached this policy may have their contracts with ADAVB terminated, or not renewed.

In circumstances where an employee's behaviour or conduct may involve a breach of any Australian law, ADAVB may notify the police or other relevant government authority.

Branch Policy Statement Number	01.07
Adopted by Council	21 October 2024
Reviewed by Constitution and Policy Committee	12 September 2024
Amended by Council	
Relevant Rules	
Relevant By-Laws	
See also	