

# Human Appeal International Australia

## Fraud Risk Management Policy

Version Number	Approval Date:	Approved By	Review Date
Version 1	28 June 2022	Board of Directors	Annually

This Policy is issued under the authority of the Board of Directors holding responsibility for the entities that comprise the Human Appeal International Australia (HAIA) Group and should be read together with related documents within the HAIA Group Policy Framework, which sets out the scope, context and definitions common to our policies, procedures and practices.

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### Policy Statement

1. This Policy Statement sets out the principles that Directors of Human Appeal International Australia Group, HAIA Domestic and Internationally based HAIA Group staff, third-party partners, domestic and international contractors and/or sub-contractors and volunteers engaged from time to time by HAIA Group to undertake charitable activity both Domestically and internationally to undertake charitable activity both Domestically and Internationally, will following in addressing Fraud risk.
2. Just like commercial organisations, not-for-profit organisations may be subject to fraudulent activity and must therefore implement effective prevention strategies to minimise legal and financial exposure.

### Purpose

3. The purpose of this Policy is to:
  - a. Ensure that all parties are aware of their responsibilities regarding the identification and prevention of fraudulent activity.
  - b. Ensure that Directors of HAIA Group, HAIA Domestic and Internationally based HAIA Group staff, third-party partners, domestic and international contractors and/or sub-contractors and volunteers engaged from time to time by HAIA Group to undertake charitable activity both Domestically and internationally understand who to report to in the event that they suspect fraudulent activity.
  - c. Provide an insight into how to respond to an allegation regarding fraudulent activity.

- d. Express a clear statement to Directors of HAIA Group, HAIA Domestic and Internationally based HAIA Group staff, third-party partners, domestic and international contractors and/or sub-contractors and volunteers engaged from time to time by HAIA Group to undertake charitable activity both domestically and internationally forbidding fraudulent activity for the benefit of the organisation.

### Fraud Risk Tolerance

4. HAIA Group will not tolerate fraud in any aspect of its operations.

### Fraud Investigation

5. HAIA Group 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, and length of service or relationship with the organisation of any party who might be the subject of such investigation.
6. Any fraud shall constitute grounds for dismissal. Any serious case of fraud, whether suspected or proven, shall be reported to the relevant and appropriate authorities such as the police and the ombudsman.

### Fraud Reporting

7. Directors of HAIA Group, HAIA Domestic and Internationally based HAIA Group staff, third-party partners, domestic and international contractors and/or sub-contractors and volunteers engaged from time to time by HAIA Group to undertake charitable activity both Domestically and internationally have the responsibility to report suspected fraud.
8. HAIA Domestic or Internationally based HAIA Group staff, third-party partners, domestic and international contractors and/or sub-contractors and volunteers engaged from time to time by HAIA Group to undertake charitable activity both Domestically and internationally who suspects fraudulent activity must immediately notify their supervisor or the HAIA Group CEO about the concern unless that supervisor or the HAIA Group CEO are suspected to be involved.
9. In situations where HAIA Domestic or Internationally based HAIA Group staff, third-party partners, domestic and international contractors and/or sub-contractors and volunteers engaged from time to time by HAIA Group to undertake charitable activity both Domestically and internationally notifies their supervisor, the supervisor must then notify the HAIA Group CEO unless the HAIA Group CEO is suspected to be involved.
10. In situations where HAIA Domestic or Internationally based HAIA Group staff, third-party partners, domestic and international contractors and/or sub-contractors and volunteers engaged from time to time by HAIA Group to undertake charitable activity both Domestically and internationally believes the suspected fraud may involve the supervisor or the HAIA Group CEO they must immediately notify a member of the HAIA Group Board not suspected to be involved in the Fraud.
11. In situations where HAIA Domestic or Internationally based HAIA Group staff, third-party partners, domestic and international contractors and/or sub-contractors and volunteers engaged from time to time by HAIA Group to undertake charitable activity

both Domestically and internationally believes the suspected fraud may involve members of the HAIA Group Board a report to ANCN or Relevant law enforcement agency is recommended.

12. Any person reporting a fraud, or a suspected fraud, shall not be penalised for raising a concern of this nature.

### Responsibilities

13. The HAIA Group Board has ultimate responsibility for the prevention and detection of fraud and is responsible for ensuring that appropriate and effective internal control systems are in place.
14. The HAIA Group CEO is responsible for dealing with and investigating instances of fraud reported to them.
15. All HAIA Group managers must ensure that they:
  - a. Assess the risk of fraud within their area of control;
  - b. Educate staff/volunteers/contractors about fraud prevention and detection;
  - c. Facilitate the reporting of suspected fraudulent activities.
16. HAIA Group Management should be familiar with the types of improprieties that might occur within their area of responsibility and be alert to any indications of such conduct.
17. All HAIA Domestic and Internationally based HAIA Group staff, third-party partners, domestic and international contractors and/or sub-contractors and volunteers engaged from time to time by HAIA Group to undertake charitable activity both Domestically and internationally share in the responsibility for the prevention and detection of fraud.

### Review of this Policy

18. This policy is to be reviewed annually and any recommendations relating to changes to the Policy are to be forwarded to the HAIA Group Board of Directors for determination in a timely manner.