
FRAUD AND CORRUPTION PREVENTION AND CONTROL POLICY

1. Purpose

Each of us in Red Cross is committed to our values and Fundamental Principles, as the basis of our activities to achieve our mission.

Consistent with our values and Fundamental Principles, Red Cross has a culture of high ethical standards, including compliance with applicable laws, contractual and other obligations and Red Cross policies. Those standards are reflected in the Ethical Framework for all Red Cross People – that is, any member of a governance body (members of the Board and of Divisional Advisory Boards and their committees), members, volunteers and staff.

Consistent with our values and Fundamental Principles, Red Cross aims for:

- a culture of high ethical standards of behaviour by Red Cross People;
- compliance with applicable laws, contractual and other obligations and Red Cross policies; and
- appropriate accountability to donors, funders, corporate and other partners, supporters and Red Cross People.

Any Fraud or Corruption in Red Cross:

- breaches our ethical standards;
- generally is a criminal or other offence, or a breach of the law;
- damages the integrity and financial capacity of Red Cross;
- damages the reputation of Red Cross; and
- significantly inhibits the capacity of Red Cross to achieve its mission.

2. Scope

This policy applies to all Red Cross People, other than those engaged by the Australian Red Cross Blood Service (which has a separate Fraud and Corruption Prevention Policy).

Red Cross People include any member of a governance body (members of the Board and of Divisional Advisory Boards and their committees), members, volunteers and staff.

3. What is Fraud and Corruption?

'Corruption' includes

- a dishonest activity in which a person acts contrary to the interests of Red Cross and misuses their position in order to achieve personal gain or a gain for another person or body or;
- the receipt or giving of a bribe (e.g., a payment in money or a benefit in kind which is intended to cause a person to act (or not to act) contrary to the interests of Red Cross, or Red Cross Policy or the public interest, and without the knowledge of Red Cross).

'Fraud' includes:

- dishonest activity causing actual or potential loss to Red Cross (including theft of money, goods or other property);
- deliberate falsification, concealment, destruction or use of falsified documentation used or intended for use for a normal business purpose;
- improper use of information or position;
- embezzlement or
- misappropriation of monies or property.

4. Zero tolerance

Red Cross will not tolerate any Fraud or Corruption in any way to any extent ('zero tolerance'). Red Cross is committed to preventing and dealing promptly and appropriately with, Fraud or Corruption.

5. Achieving a Red Cross free of fraud and corruption

As an organisation, we keep Red Cross free of fraud and corruption by:

- providing systems, tools, and resources to support:
 - prevention,
 - detection, and
 - investigationof fraud and corruption;
- promoting and providing training in ethical behaviour (including in applicable Ethical Framework);
- identifying roles and responsibilities in connection with prevention, investigation and control of fraud and corruption;
- providing training in connection with prevention, investigation and control of fraud and corruption;
- complying with contractual and other reporting obligations to funders and statutory bodies;
- complying with reporting obligations to external law enforcement or regulatory bodies.

We take on personal responsibility for keeping Red Cross free of fraud and corruption by:

- ensuring that we behave ethically and that behaving ethically is 'front-of-mind' at all times
- actively promoting ethical behaviour in all that we do
- being aware of and acting in accordance with our Ethical Framework
- complying with another applicable Code of Conduct (such as a partner's code of conduct when we are working with a partner organisation)
- complying with Red Cross finance and procurement policies and procedures
- undertaking training in the Fraud and Corruption Prevention and Control Policy and in procedures for its implementation
- being alert to recognise indicators of possible fraud or corruption
- reporting any good faith concerns that fraud or corruption may be occurring in Red Cross, or in connection with transactions or activities engaged in by Red Cross, so those concerns can be assessed and, if appropriate, investigated and suitable action taken

6. Raising Concerns and Reporting

If you, as a Red Cross Person, have a concern that fraud or corruption may be occurring in Red Cross, or in connection with transactions or activities engaged in by Red Cross, you must report it immediately via Report It.

Reports must be made in good faith.

If the concern you wish to raise relates to Fraud or Corruption by the Chief Executive Officer or Chief Financial Officer, the report must be made **directly and solely** to the Chair of the Audit & Risk Committee, A&RCChair@redcross.org.au for provision to the President.

Red Cross may report any concern raised about Fraud or Corruption to the police and any relevant funding body, as appropriate.

7. Investigation

Red Cross will investigate all reports of Fraud or Corruption.

Investigations will be conducted confidentially, fairly, objectively and without bias. Internal or external investigators may be appointed to investigate all reports.

8. Outcome

Any finding from an investigation that a Red Cross Person has committed or been involved with fraud or corruption, will be taken very seriously. It may result in legal and/or disciplinary action against the person, including employment termination and action to recover any losses suffered by Red Cross.