



Managing Fraud and Dishonest Behaviour Policy

Document number: PO2020-017 Version 2

Approval

Policy owner	Executive Director, Corporate Strategy		
Approved by	Executive Leadership Team, State Council		
Date approved	04.02.2020	Review date	04.02.2022

Purpose

1. The Society of St Vincent de Paul (NSW) and the company titled the St Vincent de Paul Society NSW (together the Society) are committed to maintaining an ethical organisation where fraud, dishonest behaviour, theft and serious waste of Society money or resources (referred to in this policy as fraud and dishonest behaviour) are not tolerated.
2. The purpose of this Policy is to:
 - provide clear guidance on what constitutes fraud and dishonest behaviour
 - provide a clear statement of the Society's position on, and approach to dealing with, fraud and dishonest behaviour
 - ensure that all parties are aware of their responsibilities regarding the identification and prevention of fraud and dishonest behaviour
 - ensure that Society Personnel (members, volunteers and employees) understand who to report to in the event that they suspect fraud and dishonest behaviour
 - provide guidance on how to respond to an allegation regarding fraud and dishonest behaviour
 - outline the consequences for those who engage in such conduct.

Scope

3. This policy applies to all Society Personnel (members, volunteers and employees) engaged in any capacity in the Society.
4. This policy and procedures applies to all forms of fraud and dishonest behaviour, theft and serious waste of Society money or resources as defined in **Appendix 1: Definitions** (examples of potential fraud and dishonest behaviour are provided in **Appendix 4**).
5. This policy should be read in conjunction with the Procedures below, and in conjunction with the Whistleblower Policy.

Related policies and procedures

6. Related policies and procedures include:
 - Code of Conduct for Members, Volunteers and Staff
 - Complaint Handling Policy
 - Conflict of Interest Policy
 - Delegations of Financial Authority Policy
 - Managing Misconduct Policy
 - Privacy Policy
 - Records Retention Policy
 - Whistleblower Policy
 - Workplace Manual 2008

Policy principles

7. The Society has zero tolerance for fraud and dishonest behaviour, whether it is for personal gain or for the benefit of the Society.
8. All Society Personnel have a responsibility to act in accordance with the Society's Code of Conduct at all times, and to take necessary steps to prevent fraud and dishonest behaviour.
9. Any person who suspects the commission of fraud and dishonest behaviour, is required to immediately report it to a Senior Manager or appropriate person in authority within the Society.
10. The Society will:
 - take all allegations of fraud and dishonest behaviour seriously and will respond promptly and appropriately
 - conduct objective and impartial investigations, regardless of the position, title, length of service or relationship with the organisation, of the subject of the investigation
 - respect and protect the privacy and confidentiality of all parties
 - ensure that no one is adversely affected because they have, in good faith, reported, suspected or confirmed fraud and dishonest behaviour.
11. Any confirmed fraud and dishonest behaviour may constitute grounds for dismissal.
12. Any serious case of fraud and dishonest behaviour, whether suspected or proven, will be reported to the relevant and appropriate authorities such as the police, Ombudsman, Australian Charities and Not-for-profits Commission (ACNC) or the Australian Securities and Investments Commission (ASIC).

Roles and responsibilities

13. The NSW State Council, the Board of St Vincent de Paul Society NSW, and the Executive Leadership Team have ultimate responsibility for:
 - the prevention and detection of fraud and dishonest behaviour
 - ensuring that appropriate and effective internal control systems are in place.
14. All Managers must ensure that they:
 - are familiar with the types of improprieties that may occur within their area of responsibility and be alert to any indications of such conduct
 - assess the risk of fraud within their area of responsibility
 - educate Society Personnel who report to them about fraud prevention and detection
 - facilitate the reporting of suspected fraud and dishonest behaviour.
15. All Society Personnel must:
 - promote a culture that encourages and supports ethical workplace practices and responsibility across the Society
 - comply with the Code of Conduct and Whistleblower Policy at all times
 - follow the procedures detailed below
 - prevent and identify fraud and dishonest behaviour

- report any instances of suspected or confirmed fraud and dishonest behaviour promptly to a Senior Manager.

16. The roles and responsibilities of specific individuals are annexed at **Appendix 3**.

Review

17. This Policy and its implementation will be reviewed every two years, or on an as needs basis as required to align with legislative or practice changes.

Further assistance

18. Society Personnel should speak with their Manager regarding any questions about the implementation of this Policy.
19. Feedback regarding the implementation of this Policy can be provided to the Executive Director, Corporate Strategy.

References

20. Legislation, regulations and guides relevant to this Policy include:

- Australian Charities and Not-for-profits Commission, *Protect Your Charity from Fraud: The ACNC's guide to fraud prevention* (2019)
- Australian Charities and Not-for-profits Commission, *Top 10 Tips to Protect Your Charity from Fraud* (2013, updated 2018)
- *Australian Securities and Investments Commission (ASIC) Act 2001* (Cth)
- Australian Standard AS 8001-2008- Fraud and Corruption Control
- Australian Standard AS 8004-2003-Whistleblower Protection Programs for Entities
- *Corporations Act 2001* (Cth)
- *Health Records and Information Privacy Act 2002* (NSW) and associated Health Privacy Principles
- *Privacy Act 1988* (Cth) and Australian Privacy Principles
- *Privacy and Personal Information Protection Act 1998* (NSW), and associated Information Protection Principles
- *Treasury Laws Amendment (Enhancing Whistleblower Protection) Act 2018* (Cth)

Approval and amendment history

Version	Approval authority	Date	Amendment summary
Doc #	Board of Directors	1 February 2014	NA
Doc # PO2020-017	Executive Leadership Team State Council	2 February 2020	Update and reformatting into new policy template

Doc # PO2020- 017 Version 2	Executive Director Corporate Services	27 July 2020	Updated Policy Owner to align with organisational structure changes
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Appendix 1: Definitions

Relevant definitions include:

<p>Dishonest behaviour</p>	<p>Dishonest behaviour involves actions that are not consistent with the standards of expected behaviour as detailed in the Code of Conduct, particularly those behaviours associated with the values of professional and ethical behaviour, transparency, accountability, confidentiality and lawfulness.</p> <p>Dishonest behaviour includes, but is not limited to behaviour such as: misuse of information; use or disclosure of information for an improper use; acceptance of any gifts for personal benefits; collection of goods donated to the Society for personal use; submission of incorrect timesheets, mileage or reimbursement claims; accepting bribes, knowingly recording inaccurate information; and failure to disclose a conflict of interest (See examples at Appendix 4)</p>
<p>Employee</p>	<p>An employee is a paid member of staff unless otherwise specified. This includes full time, part time, fixed term or casual staff, contractors providing services to the Society, and those engaged in the performance of duties for the Society from a labour hire agency.</p>
<p>Fraud</p>	<p>Dishonest activity causing actual or potential financial loss to any person or entity including theft of moneys or other property by employees or persons external to the entity and where deception is used at the time, immediately before or immediately following the activity. This also includes the deliberate falsification, concealment, destruction or use of falsified documentation used or intended for use for a normal business purpose or the improper use of information or position for personal financial benefit.</p> <p>The theft of property belonging to an entity by a person or persons internal to the entity but where deception is not used is also considered 'fraud' for the purposes of this definition.¹</p>
<p>Integrity Hotline and website reporting</p>	<p>This is a confidential telephone line (1300 304 550) and email facility (vinniesnsw@stopline.com.au) managed and staffed by an independent third party for anyone to call between the hours of 8.00am and 6.00pm (Monday to Friday) for advice and for making legitimate allegations of wrongdoing, either anonymously or not, for investigation.</p>

¹ Australian Standard AS 8001-2008- Fraud and Corruption Control.

Investigator	An Investigator is any suitably skilled employee of the Society, or a third party engaged externally by the Society, who is tasked with undertaking an investigation under this policy.
Manager	The Society member, volunteer or employee responsible for the supervision of members, volunteers or employees.
Personnel	Any person (or group of people) engaged by the Society to assist in its works. This includes members, volunteers, employees, contractors and consultants.
Serious waste of Society money or resources	Includes the deliberate or reckless uneconomical, inefficient or ineffective use of resources, which results in the loss or wastage of Society money or resources.
Theft	The deliberate permanent misappropriation of any Society property, or property belonging to anyone being assisted by the Society without appropriate consent by any person.

Appendix 2: Procedures

Detection of fraud and dishonest behaviour

1. All Personnel must immediately report any activities which they reasonably believe involve fraud, dishonest behaviour, theft or serious waste of Society money or resources (referred to in this policy as fraud and dishonest behaviour) to a Senior Manager.
2. Managers must ensure that all cases of suspected fraud and dishonest behaviour are reported to the Manager, Internal Audit.
3. If Society Personnel suspect their supervisor or manager, they may make a direct report to the Manager, Internal Audit.

Reporting allegations

4. The Allegations Flowchart (**Attachment B**) provides a visual representation of the process of reporting allegations.

Making a report

5. An allegation of fraud and dishonest behaviour must be made either:
 - in person
 - in writing (using the *Fraud and dishonest behaviour allegation form* at **Attachment A**)
 - by email
 - by telephone
 - by contacting the Society's confidential Integrity Hotline (1300 304 550) or email facility (vinniesnsw@stoline.com.au) between 8.00am and 6.00pm (Monday to Friday).
6. Members must submit an allegation orally or in writing to one of the following:
 - Conference President
 - Central Council President
 - President, NSW State Council
 - Manager, Internal Audit
 - Chief Financial Officer
 - Company Secretary
 - Chief Executive Officer
 - Chairperson of the Audit and Finance Committee
 - Integrity Hotline.
7. Employees or Volunteers must submit an allegation orally or in writing to one of the following:
 - Manager or Director
 - Executive Director
 - Manager Internal Audit
 - Chief Financial Officer
 - Company Secretary
 - Chief Executive Officer

- Chairperson of the Audit and Finance Committee
 - Integrity Hotline.
8. When allegations are made orally, the individual receiving the allegation must make sufficient notes for the matter to be investigated (using **Attachment A**).
 9. All reported allegations (written or oral) should be recorded with the following information (see **Attachment A**):
 - the nature of the conduct or behaviour
 - details of when the incident or incidents occurred
 - the individual or individuals who are involved
 - where the incident/s occurred
 - details of witnesses or others who might be aware of the matter
 - name and contact details, so that the investigator can seek further information or clarification if required (unless anonymous).

Anonymous allegations

10. The Society acknowledges that some individuals may wish to make an anonymous allegation and that anonymous allegations can highlight serious and systemic issues.
11. The Society accepts anonymous complaints through any of the methods identified above.
12. Anonymous complaints alleging criminal conduct must immediately be referred to the NSW State President and/or the Chief Executive Officer and must be addressed in accordance with the Society's legal obligations.
13. Anonymous allegations of matters of concern regarding children must immediately be dealt with following procedures set out in the Safeguarding Children Policy.
14. Where sufficient information is available, anonymous allegations will be investigated in the same manner as non-anonymous allegations.

Forwarding report to the Manager, Internal Audit

15. All reports of allegations must be provided to the Manager, Internal Audit immediately by the person who has received them.
16. The Manager, Internal Audit must immediately acknowledge receipt in writing (unless the allegation has been made anonymously).
17. The Manager, Internal Audit must liaise with the Chief Financial Officer and/or the Company Secretary depending on the circumstances in case the matter needs to be referred to the Police.

Protecting those reporting

18. Any individual making an allegation in good faith in accordance with this policy will not be subject to any detriment. Any detrimental action against a person making an allegation in good faith will not be tolerated.
19. If an individual making an allegation feels that they have been disadvantaged in any way, this should be reported to the Executive Director, Corporate Services.

20. Any individual wanting to make an external complaint should refer to the Whistleblower Policy.

Confidentiality

21. All Personnel have a responsibility to observe confidentiality at all times while a matter is under investigation and to fully cooperate with those undertaking such investigations.

22. The Society will take steps to ensure that confidentiality is maintained while an allegation is being investigated, unless disclosure is required by law.

Investigating allegations of fraud and dishonest behaviour

Initial assessment

23. Depending on the nature of the allegation, the Manager, Internal Audit must notify the Chief Financial Officer and/or the Executive Director, Corporate Services.

24. Where the allegation might involve the Chief Financial Officer and/or the Executive Director, Corporate Services, the CEO must be notified.

25. The Chief Financial Officer, Executive Director, Corporate Services or CEO will determine:

- if the suspected dishonest behaviour warrants investigation
- who will undertake the investigation
- how it will be carried out.

26. If it is determined that the allegation does not fall within the scope of this policy, the person making the allegation will be notified and advised of other options that may be available (unless the allegation was anonymous).

27. Generally, investigations will be conducted by one of the following:

- Director of Legal and Complaints
- Manager, Internal Audit
- any suitably skilled Personnel with the assistance of the Manager Internal Audit
- an external third party employed by the Society
- the Police.

28. Once suspected fraud and dishonest behaviour is reported, immediate action will be taken to prevent the theft, alteration or destruction of relevant records. Such actions include, but are not limited to:

- securing relevant records / information and placing them in a secure location
- limiting access to the location where the records / information currently exists
- preventing the individual suspected of committing the fraud and dishonest behaviour from having access to the records/information.

Investigation

29. All investigations must be undertaken by a suitable Investigator.

30. The investigation may involve seeking clarification from the person making the report, any witnesses and any Society Personnel who are able to provide information about the allegation.

31. While carrying out the investigation, the Investigator will uphold the principles of due process, natural justice, fairness and openness at all times.

Investigation protocols

32. The Investigator will consider all relevant material, interview witnesses where appropriate, and determine:

- the facts
- the relevance, reliability and consistency of the collected information
- whether Society representatives have followed standard procedures
- whether any systemic performance or management issues arise.

33. The Investigator will keep all records of the investigation securely in appropriate files.

Formal interview

34. Once sufficient evidence has been gathered, a formal interview should be arranged with the individual suspected of fraud and dishonest behaviour.

35. Guidelines for conducting a formal interview:

- Individuals being investigated should be given at least three business days prior notice of the alleged fraud and dishonest behavior to give sufficient time to prepare for a formal interview and to arrange for representation or a friend to be present.
- Depending on the circumstances, an Investigator may invite another individual to attend the formal interview to take minutes, act as a witness or otherwise provide support.
- Minutes should be taken of the meeting, which should be subsequently signed by all present as a record of the meeting.
- Where specific questions are to be directed at the individual being investigated, they should be provided with reasonable time to collect evidence or provide written explanations to those questions.
- The individual subject to the interview, will be advised that, the purpose of the interview is to seek information and explanation to further the investigation and that no findings have been made.

False, Trivial or vexatious allegations

36. If upon investigation, any allegation is found to be fabricated, unfounded, trivial or vexatious the individual who made the allegation may be subject to disciplinary action.

Suspension during investigation

37. Where there is reasonable concern that the continued presence of the individual under investigation is not appropriate for reasons, including due to possible reoccurrence or conflict with others, suspension or temporary transfer to another area may be considered.
38. Suspension is a management decision, should be on a case by case basis, and must involve relevant senior decision makers:
 - Chief Financial Officer
 - Executive Director
 - NSW State President and/or Central Council President (when individual under investigation is a Member)
 - Executive Director, Corporate Services (when individual under investigation is an employee)
 - Executive Director, Membership, Volunteers and Regional Operations (when individual under investigation is a volunteer).

Disciplinary action

39. If an allegation of fraud is substantiated by the investigation, the individual must be advised of those findings and given an opportunity to respond.
40. The Chief Financial Officer and/or the Executive Director, Corporate Services, together with the relevant Executive Director, relevant Central Council President (if a Member), and relevant Executive Director (if an employee or volunteer) must determine appropriate disciplinary arrangements, taking into account the individual's response.
41. Disciplinary action will be appropriate and proportionate and may include: termination, suspension, formal counselling, and requirement to repay money or return misappropriated items.
42. Disciplinary action, up to and including dismissal (or termination of an individual's right to work as a contractor or volunteer), must be taken by the appropriate level of management.

Reporting to external authorities

43. The Chief Financial Officer will report any serious case of fraud, dishonest behaviour, theft, or serious waste of money or resources, whether suspected or proven, as required by legislation, to the relevant and appropriate authorities including: the police, Australian Charities and Not-for-profits Commission (ACNC) or the Australian Securities and Investments Commission (ASIC).

Continuous improvement and prevention

44. At the conclusion of every investigation, recommendations will be made for improving Society policies and procedures and their implementation to prevent similar circumstances occurring in the future.
45. The Chief Financial Officer will maintain a confidential record of all suspected and confirmed fraud and dishonest behaviour.

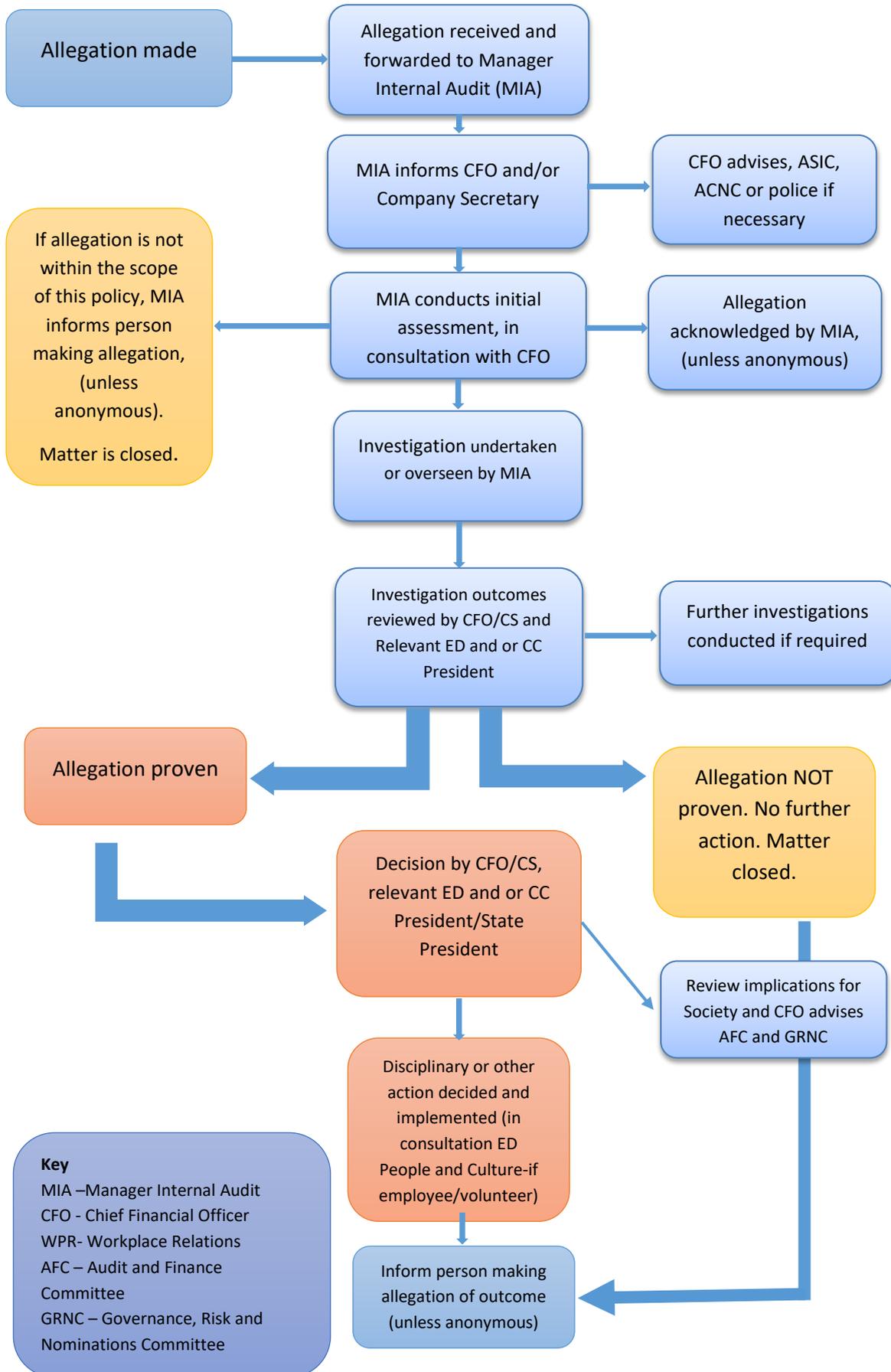
46. The Chief Financial Officer will submit a report to the Audit and Finance Committee and the Governance, Risk and Nominations Committee on all occurrences of fraud and indicate what actions have been implemented to prevent a reoccurrence.

Attachment A: Fraud and dishonest behaviour allegation form

This form should be used when making a fraud or dishonest behaviour allegation or to record an oral or anonymous allegation by any person or on their behalf – as required by the *Managing Fraud and Dishonest Behaviour Policy and Procedures*.

DETAILS OF INDIVIDUAL MAKING ALLEGATION (if not anonymous)	
Name:	
First Name	Family Name
Address:	
.....	
Email.....	
Telephone: (....)	Mobile Telephone:
Date of allegation:	
DETAILS OF ALLEGATION	
Date/s and time:	
Location/where this occurred:	
Description of incident:	
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Names of individuals involved (if known)	
.....	
Names of any witnesses:	
.....	
What outcome or resolution are you seeking?	
.....	
.....	
.....	
.....	

Attachment B: Allegations Flowchart



Appendix 3: Roles and Responsibilities

Roles	Responsibilities
Audit and Finance Committee	<ul style="list-style-type: none"> Oversee the effectiveness of the Society's fraud prevention arrangements. Receive reports of investigations of allegations of fraud, dishonest behaviour, theft and serious waste of money or resources.
State Council	<ul style="list-style-type: none"> Receive reports of investigations of allegations of fraud, dishonest behaviour, theft and serious waste of money or resources, where a Member is involved.
State Council President, NSW	<ul style="list-style-type: none"> Receive reports of investigations of allegations of fraud, dishonesty, theft or serious waste of Society money or resources concerning Members where disciplinary action may be considered.
Directors of the St Vincent de Paul Society NSW Board	<ul style="list-style-type: none"> As Directors of the Board being familiar with their fraud prevention and reporting duties under the <i>Corporations Act 2001</i> (Cth) and other relevant legislation Monitor the effectiveness of the Society's governance and risk management frameworks for the prevention of fraud and dishonesty and be satisfied that appropriate internal and external fraud control mechanisms are in place and are being implemented Receive reports of investigations of allegations of fraud, dishonest behaviour, theft or serious waste of Society money or resources
Chief Executive Officer	<ul style="list-style-type: none"> Monitor and oversee the effectiveness of the Society's prevention of fraud and dishonest behaviour. Receive reports of investigations of allegations of fraud, dishonest behaviour, theft or serious waste of Society money or resources.
Executive Director, Corporate Services	<ul style="list-style-type: none"> Provide assurance to the Audit and Risk Committee and the Governance, Risk and Nominations Committee that the Society has sound fraud and dishonesty governance arrangements in place and that these are operating effectively. Facilitate the reporting of criminal offences to the police in consultation with the NSW State President and Chief Executive Officer. After an allegation has been assessed, in discussion with the Manager, Internal Audit, decide how and who will undertake the investigation. Receive reports of investigations of allegations of fraud and dishonest behaviour and in conjunction with the relevant

	<p>Central Council President and/or Executive Director/Chief Financial Officer determine appropriate actions to be undertaken.</p> <ul style="list-style-type: none"> • Notify the Audit and Finance Committee of all instances where fraud, dishonest behaviour, theft and serious waste of Society money or resources has been identified, the final outcome, and any remedial action taken to prevent reoccurrence. • Assist Society senior leaders (Executive Directors, Chief Financial Officer and Directors) to manage the identification and prevention of fraud risks. • Liaise with the Australian Charities Not-for-profit Commission with respect to fraud allegations as detailed in 'Protect your charity from fraud: The ACNC Guide to Fraud Prevention' (2013). • Notify the ACNC of fraud after an investigation has confirmed that a fraud has occurred. • Liaise with ASIC on behalf of the Society for protected disclosures with respect to fraud issues (as detailed in ASIC and Corporations Acts). • Report external fraud against the Society to the Police and other appropriate authorities. • Ensure the Society's Risk Management Framework includes fraud prevention and is reviewed every two years.
Executive Directors/Chief Financial Officer	<ul style="list-style-type: none"> • Accountable for own actions or omissions and those of their staff and for modelling high standards of behaviour. • Ensure workplace procedures and practices are established, complied with and regularly reviewed. • Identify areas of high risk in terms of ethics, fraud, theft and workplace dishonesty and implement appropriate preventative strategies to mitigate risks to the Society. • Receive reports of investigations of allegations of fraud and dishonesty. • Ensure that allegations of fraud, dishonest behaviour, theft or serious waste of Society money or resources are appropriately investigated in conjunction with the Manager, Internal Audit. • Ensure that any individual making a fraud or dishonesty allegation is protected from any detrimental action in accordance with the Society's Whistleblower Policy.
Governance, Risk and Nominations Committee	<ul style="list-style-type: none"> • Provide assurance to the Board of the appropriateness of the Society's governance framework for the prevention of fraud and dishonest behaviour.
Manager, Internal Audit	<ul style="list-style-type: none"> • Receive allegations of fraud and dishonest behaviour. • Acknowledge and receipt allegations (unless anonymous).

	<ul style="list-style-type: none"> • Conduct initial assessment of allegations received. • Undertake investigations into allegations received, or assist and advise the individual undertaking the investigation. • Keep the person who has made the allegation informed of progress of the investigation and of the outcome of the investigation. • Ensure that investigations are completed within a period of 30 days after they have been received and receipted (unless anonymous). • Recommend appropriate actions following the completion of the investigation including any identified weaknesses in existing controls, and any necessary improvements to prevent a similar occurrence in the future. • Develop and implement tools and activities to raise management’s awareness of their responsibilities relating to fraudulent and dishonest conduct. • Assist Executive Directors and/or Chief Financial Officer to identify and manage their fraud risks.
Director, Governance, Safeguarding and Risk	<ul style="list-style-type: none"> • Oversee the creation, implementation, and monitoring of an effective governance compliance framework consistent with the Society’s Risk Management Framework. • Ensure that the Society’s Risk Management Framework includes fraud prevention strategies and practices to facilitate the effective detection, investigation, and prevention of fraud, and dishonest behaviour.
Personnel (Members, Volunteers and Employees)	<ul style="list-style-type: none"> • Maintain the highest standards of ethical behaviour in accordance with the Code of Conduct. • Be vigilant at all times to prevent and identify fraud, dishonesty, theft or waste of resources within own work area. • Behave in a lawful manner and comply with relevant legislative and Society policies and procedures. • Ensure efficient and best use of Society money and resources. • Act within the delegated authority of the role being undertaken in the Society. • Be accountable for actions and any decisions taken at work. • Comply with all internal relevant policies and procedures as they apply in relation to carrying out their duties and responsibilities including financial delegations and approval. • Not engage in, participate in, cover up or in any way assist in (including by failing to act) any form of fraud, dishonesty, theft or serious waste of Society money or resources.

	<ul style="list-style-type: none"> • Report immediately any instances of known or suspected fraud, dishonesty, theft or serious waste of Society money or resources in accordance with this Policy. • Co-operate with any investigation into an allegation of fraud, dishonesty, theft or serious waste of Society money or resources. • Maintain confidentiality during investigations. • Protect others who have made an allegation in accordance with the Society's Whistleblower Policy. • Not make false, misleading, frivolous or vexatious allegations of fraud, dishonesty, theft or serious waste of Society money or resources.
<p>Executive Directors/Chief Financial Officer/ Directors/Managers</p>	<ul style="list-style-type: none"> • Be accountable for own actions or omissions and those of the Personnel reporting to them. • Model high standards of ethical behaviour consistent with the Code of Conduct. • Be aware of potential fraud and dishonesty risks in the workplace and ensuring adequate prevention controls are in place. • Ensure workplace procedures and practices are established, complied with and regularly reviewed. • Ensure Personnel reporting to them are aware of their duties and responsibilities and ensure adequate information, instruction and training to perform them adequately and safely. • Ensure Personnel reporting to them comply with any internal controls, systems, relevant policies and procedures as they apply to carrying out their duties or activities • Treat seriously all reports of alleged fraud and dishonesty • Co-operate with any investigation into a fraud or dishonesty allegation • Ensure that any individual making a fraud or dishonesty allegation is protected from any detrimental action in accordance with the Society's Whistleblower Policy

Appendix 4: Examples of potential fraud, dishonest behaviour, theft, and serious waste of money or resources

There are many different types of fraud, dishonest behaviour, theft and serious waste of money or resources, and the methods used are constantly changing. Fraud and other types of financial crime can be committed by someone within or connected to a charity (internal fraud), or by someone who has no connection to it at all (external fraud). Some examples are detailed below. It should be noted that this is not an exhaustive list.

Fraud and dishonest behaviour	Examples
Misuse of Society assets/ resources	<ul style="list-style-type: none"> • Use of Society resources for personal use. • Unauthorised disposal of Society assets for personal gain. • Unlawful use of Society computers, vehicles, internet, telephones, mobile phones, credit cards, other payment card facilities and other property or services. • Operation of a private business using Society facilities and time. • Collection of goods which are supposed to be donated to Society for personal use.
IT usage, assets and security	<ul style="list-style-type: none"> • Unauthorised or unlawful access to or alteration of any data. • Sharing and using another's username and password. • Unauthorised use of internet or email e.g. downloading movies for personal use or viewing and or sharing offensive material. • Downloading unauthorised counterfeit or pirated software from the internet. • Access others' email accounts without permission. • Access or disclosure without authority or for personal gain, any personal information (computer or paper record) held by the Society.
Regulatory compliance and business partner communication	<ul style="list-style-type: none"> • Failure to provide information where there is a legal obligation to do so. • Deliberately providing falsified or incorrect data or information.
Personnel records, confidential and any personal information	<ul style="list-style-type: none"> • Use or disclosure of any personal, client, donor or business partner information for an improper purpose. • Unauthorised or unlawful alteration of any personal, client, donor or business partner information or data.
Salary, allowances	<ul style="list-style-type: none"> • Payment of phantom employees. • Payment to an employee for tasks or overtime not performed. • Incorrect working hours in Timesheets. • Submitting incorrect mileage claims or vehicle log sheet entries for Society travel and FBT purposes.
Grant applications	<ul style="list-style-type: none"> • Submitting false applications for grants or other charitable benefits.
Intellectual property	<ul style="list-style-type: none"> • Unauthorised release or sharing of any Society intellectual property.
Bequests	<ul style="list-style-type: none"> • Deliberately not following the correct accounting procedures for monies received from bequests to the Society.

Bribes and commissions	<ul style="list-style-type: none"> • Accepting bribes, kickbacks or other benefit or a secret commission from a supplier as an inducement to the award of a contract.
Letting contracts	<ul style="list-style-type: none"> • Failure to comply with Society tendering and contract award arrangements. • Manipulating a tender process to achieve a desired outcome. • Unauthorised release of pricing or other tender information. • Negligent or deliberate mismanagement of contracts e.g. non-compliance with contract schedules or rates. • Failure to declare any conflict of interests.
Acceptance of gifts	<ul style="list-style-type: none"> • Accepting gifts or entertainment that are neither reasonable or modest in nature (see Gifts and Entertainment Policy) or where the giver might be expecting something in return.
Secondary employment	<ul style="list-style-type: none"> • Engaging in concurrent employment outside the Society where a likely conflict of interest exists with an individual's activities at the Society.
Conflicts of interest	<ul style="list-style-type: none"> • Failure to disclose an actual, perceived or potential conflict of interest contrary to the Society's Conflict of Interest Policy • Allowing a conflict of interest to undermine the independence of an individual in carrying out any activities for the Society.
Record-keeping	<ul style="list-style-type: none"> • Knowingly recording and reporting inaccurate information, including time in lieu arrangements. • Falsifying any documentation or signatures.
Recruitment	<ul style="list-style-type: none"> • Appointing a person to a position for motives other than on merit.
Disclosure of information of changed circumstances	<ul style="list-style-type: none"> • Failure to inform the Society of any circumstances which impact on an individual's ability to undertake their activities at the Society e.g. loss of driving license where driving from place to place is part of the normal work activities.
Payment of invoices	<ul style="list-style-type: none"> • Creation and payment to ghost suppliers. • Invoice and purchase order splitting to circumvent procedures or Society delegations. • Manipulation of any financial processes to facilitate unauthorised approvals to pay or writing off debts.
Theft, serious waste and external fraud	Examples
Theft	<ul style="list-style-type: none"> • Stealing donated goods from a Vinnies Centre. • Stealing money or cash donations or petty cash. • Misusing Society banking and payment facilities such as credit cards, debit cards and taxi vouchers. • Theft of any plant, equipment or any items being stored. • Misuse or theft of welfare vouchers / gift cards (electricity, gas, water, groceries, telephone). • Claiming non-existent, excessive or inappropriate expenses. • Creating false or inflated invoices to obtain payment for goods and services that have not be supplied.

	<ul style="list-style-type: none"> • Falsification of leave, medical certificates timesheets or overtime claims. • Submitting false claims for worker's compensation for workplace injuries. • Failure to disclose and record any leave taken. • Theft of any property belonging to anyone who is being assisted by the Society.
Serious waste of Society money or resources	<ul style="list-style-type: none"> • Deliberately or knowingly not following Society authorising expenditure practices resulting in an invoice being paid more than once, or a greater amount being paid, or where an invoice is paid where no goods or services have been received. • Luxurious, indulgent or excessive expenditure. • The purchase of unnecessary or inadequate goods and services or where the lowest price has not been obtained (without a sufficiently justifiable reason) for comparable goods and services. • Employing an individual for a role they do not have the required skills to perform. • Unnecessary staff being employed in a particular area incurring costs which might otherwise have been avoided.
External money laundering	<ul style="list-style-type: none"> • Receiving cash donations which the Society is subsequently asked to return by cheque.
External fraud	<ul style="list-style-type: none"> • Using false invoices or supporting documentation to obtain money from the Society. • Duplication of payments. • Unauthorised fundraising in the Society's name such as a fraudulent appeal website and or activity. • Offering bribes or other inducements to secure any contract or financial arrangement with the Society. • Incorrect charging for labour and materials, misuse of Society assets or product substitution for one of a lesser quality. • Any e-fraud and phishing emails sent to or on behalf of the Society soliciting money or requesting personal information. • Any attempt to gain unauthorised access to the Society network or system or technology, through hacking, the use of viruses and worms and denial of service attacks.