



Managing Fraud and Dishonest Behaviour Policy

Document number: PO2023-017

Approval

Policy owner	Chief Financial Officer		
Approved by	Executive Leadership Team, State Council		
Date approved	State Council – 17.08.2023 ELT – 01.08.2023	Review date	17.08.2026

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 and manage allegations regarding fraud and dishonest behaviour.

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 apply to all forms of fraud and dishonest behaviour, theft and serious waste of Society money or resources:
 - by Society Personnel
 - members of the public or external parties
 - 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 attached, and in conjunction with the Whistleblower Policy.

Related policies and procedures

6. Related policies and procedures include:
 - Code of Conduct
 - Conflict of Interest Policy
 - Counselling and Disciplinary policy
 - Credit card policy
 - Delegations of Authority Policy
 - Feedback and Complaints Policy
 - Gifts and Entertainment Policy
 - Information Security Policy
 - Privacy Policy
 - Records Management Policy
 - Store card policy
 - Whistleblower Policy

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.

Preventing fraud and corruption

8. The Society implements the following measures to proactively prevent the occurrence of fraud:
 - a. Requiring Personnel to act in accordance with the law and the Society's Code of Conduct
 - b. Proactively managing risks posed by:
 - i. conflicts of interest
 - ii. gifts and similar benefits
 - iii. performance-based targets linked to financial objectives.
 - c. Internal controls to prevent fraud and theft which are periodically reviewed, with a structured process for continuous improvement
 - d. A cyber security strategy to prevent technology-enabled fraud.

Detecting fraud and corruption

9. The Society implements the following measures to detect fraud:
 - a. financial and data analysis to identify any irregularities
 - b. internal audits to test the effectiveness of internal controls
 - c. ensuring a range of fraud and corruption reporting channels including complaints management and a whistleblower hotline

Responding to fraud and corruption

10. Any person who suspects an incident or concern of fraud or dishonest behaviour, is required to immediately report it to a Manager, Supervisor or President. Refer to Appendix 2: Procedures for more information.
11. 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.
12. Any confirmed fraud and dishonest behaviour may constitute grounds for dismissal.
13. 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) or other external regulatory authorities or funding bodies as required.

Roles and responsibilities

The roles and responsibilities of Society Personnel to prevent, detect, report and respond to fraud are defined as follows:

Roles	Responsibilities
NSW State Council	<ul style="list-style-type: none"> • Oversee and monitor the prevention and detection of fraud and dishonest behaviour in their area of responsibility • Receive and escalate reports of investigations of allegations of fraud, dishonest behaviour, theft and serious waste of Society money or resources
Directors of the St Vincent de Paul Society NSW Board	<ul style="list-style-type: none"> • Acknowledge and accept overall accountability for controlling the Society's fraud and corruption risks • Acknowledge fraud and corruption as a serious risk • Have awareness of the Society's fraud and corruption exposures • Demonstrate a high level of commitment to controlling the risk of fraud and corruption both against the Society and by the Society • Be familiar with their fraud prevention and reporting duties under the Corporations Act 2001 (Cth) and other relevant legislation • Receive regular reports of fraud and dishonest behaviour • Understand the obligations and liabilities when fraud occurs
Audit and Finance Committee	<ul style="list-style-type: none"> • Oversee and monitor the prevention and detection of fraud and dishonest behaviour across the Society • Receive final reports of investigations into fraud, dishonest behaviour, theft and serious waste of money or resources • Receive annual reports on incidents of fraud included in the fraud register • Provide assurance to the Board of the appropriateness of the Society's governance framework for the prevention of fraud and dishonest behaviour
Chief Executive Officer	<ul style="list-style-type: none"> • Oversees and monitor the prevention and detection of fraud and dishonest behaviour across the Society • Receives reports of investigations of allegations of fraud, dishonest behaviour, theft or serious waste of Society money or resources. • Ensure external reporting to ACNC and ASIC is completed
Chief Financial Officer	<ul style="list-style-type: none"> • Ensures external reporting to Police, Australian Charities Not-for-profit Commission (ACNC), Australian Securities and Investments Commission (ASIC), and other external authorities are completed as required • Notifies 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 of any investigation, and any remedial action taken to prevent reoccurrence
Director, Governance and Risk	<ul style="list-style-type: none"> • Oversees the creation, implementation, and monitoring of an effective governance compliance framework consistent with the Society's Risk Management Framework • Present a report on the effectiveness of the policy and any incidents of fraud at least once a year to the Audit and Finance Committee and to the Governance, Risk and Nominations Committee when relevant. • Manages any conflict of interest and oversees the conflict of interest register

	<ul style="list-style-type: none"> Facilitates the inclusion of relevant fraud risks in directorate risk registers, and mitigation actions to support the effective detection, investigation, and prevention of fraud, and dishonest behaviour In consultation with the Chief Financial Officer or relevant Executive Director, and Manager, Internal Audit, determine the course of action following an allegation of fraud or dishonest behaviour, and if required, appoint an investigator Oversees the investigations process and keeps relevant stakeholders informed, where this is not overseen by the ED, People, Culture and Safety Ensures external reporting to Police, Australian Charities Not-for-profit Commission (ACNC), Australian Securities and Investments Commission (ASIC), and other external authorities are completed as required
Executive Directors	<ul style="list-style-type: none"> Oversee and monitor the preventions and detection of fraud and dishonest behaviour in their area of responsibility Communicate and ensure the implementation of this policy in their area of responsibility Identify areas of high risk in terms of ethics, fraud, theft and workplace dishonesty, include these risks in directorate risk registers, and implement appropriate preventative strategies to mitigate risks to the Society Receive and escalate reports of fraud and dishonest behaviour according to this Policy Ensure that any individual making a fraud or dishonesty allegation in good faith is protected from detrimental action
Executive Director, People, Culture and Safety	<ul style="list-style-type: none"> Oversees the investigations process (where this is not overseen by the Director, Governance and Risk) and keeps relevant stakeholders informed Oversees counselling and disciplinary action initiated as an outcome of an investigation into fraud or dishonest behavior regarding an employee Enables regular training on prevention and detection of fraud and dishonest behaviour to Society Personnel
Executive Director, Members, Volunteers and Regional Operations	<ul style="list-style-type: none"> Determines actions to be taken at the conclusion of an investigation regarding members in consultation with the relevant State or Central Council President.
Investigator	<ul style="list-style-type: none"> Ensures investigations into fraud or dishonest behaviour are completed within 42 days after they have been received Presents an investigation report and recommendations to the Chief Financial Officer and Director, Governance and Risk Keeps the person reporting the incident informed of the progress of any investigations being undertaken
Manager, Internal Audit	<ul style="list-style-type: none"> Receives and escalates allegations of fraud and dishonest behaviour Advises on appropriate course of action following an allegation of fraud and dishonest behaviour, and whether a matter should be investigated internally or by an external investigator Contributes to or conducts investigations into fraud or dishonest behaviour as directed by Chief Financial Officer or Director, Governance and Risk

	<ul style="list-style-type: none"> • Recommends 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 • Develops and implements tools and activities to raise management’s awareness of their responsibilities relating to fraudulent and dishonest behaviour • Supports education and training on the prevention and detection of fraud and dishonest behaviour for Society Personnel • Assists Executive Directors and/or Chief Financial Officer to identify and manage their fraud and dishonest behaviour risks • Coordinates periodic assessment of the Society’s fraud and corruption risks • Maintains fraud register • Regularly tests the internal controls to prevent fraud and corruptions
Chief Information Officer	<ul style="list-style-type: none"> • Establishes, implements, maintains and continuously improves the information security management process to minimise technology enabled fraud
Managers, Supervisors and Presidents	<ul style="list-style-type: none"> • Ensure incidents or concerns related to allegations of fraud or dishonest behaviour are reported immediately and managed according to this policy • Treat all allegations of fraud and dishonest behaviour seriously • Ensure Personnel are provided with information, support, and supervision on their responsibilities to prevent fraud and dishonest behaviour and implement this policy • Co-operate with any investigation into a fraud or dishonest behavior allegation • Ensure that any individual making a fraud or dishonesty allegation in good faith is protected from detrimental action
Society Personnel (Members, Volunteers and Employees)	<ul style="list-style-type: none"> • Adhere to the Society’s Code of Conduct • Adhere to this policy and seek advice or support on how to implement • Report immediately any instances of known or suspected fraud, dishonesty, theft or serious waste of Society money or resources in accordance with this Policy

Review

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

Further assistance

15. Society Personnel should speak with their manager, Supervisor or President, Manager, Internal Audit, or Chief Financial Officer regarding any questions about the implementation of this Policy.

16. Feedback regarding the implementation of this Policy can be provided to the Chief Financial Officer.

References

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

- Australian Standard AS 8001: 2021 *Fraud and corruption control*

- 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)
- *Corporations Act 2001* (Cth)
- *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
Doc # PO2020-017 Version 3	Chief Financial Officer	July 2023	Update the policy with reference to Australian Standards AS8001:2021 Fraud and Corruption Control and revise the reporting procedures
Doc # PO2023-017	Executive Leadership Team State Council	1 August 2023 & 17 August 2023	Update the policy to outline key approaches to preventing, detecting and responding to fraud and corruption under Policy Principles (previously, the emphasis was on responding to fraud); <ul style="list-style-type: none"> • roles and responsibilities have been more clearly defined • the process for reporting on and responding to allegations of fraud has been improved.

Appendix 1: Definitions

Relevant definitions include:

Dishonest behaviour	<p>Dishonest behaviour involves action or inaction that is 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>
Fraud	<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 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>
Information security	Preservation of confidentiality, integrity and availability of information
Whistleblower Hotline and website reporting	This is a confidential telephone line (1300 304 550) and email facility (vinniesnw@stoptline.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.
Investigator	An Investigator is any suitably skilled employee of the Society, or an external third party engaged by the Society, who is tasked with undertaking an investigation under this policy.
Manager	Personnel responsible for the supervision of members, volunteers or employees.
Society Personnel	All Society Personnel including members, volunteers, employees, office holders and Directors. This policy does not distinguish between the roles and responsibilities of paid and unpaid Society Personnel unless specifically prescribed by relevant legislation.
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 dishonest taking of something that belongs to someone else, without intending to return it.

¹ Australian Standard AS 8001-2021- Fraud and Corruption Control.

Appendix 2: Procedures

Detection and reporting fraud and dishonest behaviour

18. 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 their Manager, Supervisor or President.
19. Managers, Supervisors or Presidents must notify the Manager, Internal Audit, or Director Governance and Risk, either:
 - i. Through the Integrated Risk Management System (IRMS) (the Manager, Internal Audit will be notified of all incidents marked as potential fraud)
 - ii. In person
 - iii. In writing
 - iv. By email
 - v. By telephone
20. If an employee, member or volunteer suspects their Manager, Supervisor or President is involved in fraud or dishonest behaviour, they must report the activity directly to the Manager, Internal Audit, Chief Financial Officer or Director, Governance and Risk.
21. Where the allegation might involve any one of the Manager, Internal Audit, Chief Financial Officer or Director, Governance and Risk, the Chief Executive Officer must be notified.
22. Society Personnel who are Eligible Whistleblowers and wish to make an anonymous report can contact the Society's Whistleblower Officer via:
 - phone 1300 304 550 or email whistleblower@vinnies.org.au or
 - through the Whistleblower Hotline (an external independent provider) via phone 1300 304 550 or email vinniesnsw@stipline.com.au.

Refer to the Society's Whistleblower policy for more information.

23. The Allegations Flowcharts (**Attachment A and Attachment B**) provide a visual representation of the process of reporting allegations.
24. The following information should be provided for reporting fraud and dishonest behaviour:
 - 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).

Investigations and external reporting

Initial assessment

25. On receipt of an allegation of fraud or dishonest behaviour, the Manager, Internal Audit in consultation with the Director, Governance and Risk, will conduct an initial assessment/ inquiry to determine the best course of action. The assessment will consider:

- whether the allegation/incident meets the definition of fraud and should be investigated as such
- if the suspected dishonest behaviour warrants an internal or external investigation
- who will undertake the investigation
- how it will be carried out
- if the incident needs to be reported to Police, Ombudsman, Australian Charities and Not-for-profits Commission (ACNC) or the Australian Securities and Investments Commission (ASIC) or other external regulatory authorities or funding bodies as required
- if the person under investigation may need to be stood down during the investigation and consult the relevant senior decision maker.

26. Where it is determined that an investigation is required and concerns:

- a Central Council President, the State Council President must be informed
- the State Council President, the National Council President must be informed
- the Executive Director or Chief Financial Officer, the Chief Executive Officer must be informed
- the CEO, the Board Chair must be informed.

Reporting to external authorities

27. The Chief Financial Officer or Director, Governance and Risk 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), the Australian Securities and Investments Commission (ASIC) or other external regulatory authorities or funding bodies as required.

Suspension during investigation

28. If the initial assessment determines that an investigation is required and there is reasonable concern that the continued presence of the individual under investigation is not appropriate for reasons including, possible reoccurrence or conflict with others, a suspension or temporary transfer to another area may be considered.

29. Suspension is a management decision and should be on a case-by-case basis. The decision to suspend a member, volunteer or employee must involve relevant senior decision makers:

- Chair of the Board (when the individual under investigation is the Chief Executive Officer)
- Chief Executive Officer (when an individual under investigation is a Director, Regional Director or Executive Director)
- Executive Director (when the individual under investigation is in their directorate)
- NSW State President and/or Central Council President (when the individual under investigation is a member)
- Executive Director, Membership, Volunteers and Regional Operations (when the individual under investigation is a volunteer other than a retail volunteer).

Investigation

30. The investigation may be conducted by one of the following:

- a senior manager or staff member with investigation qualifications
- an external third-party investigator employed by the Society
- the Police.

Where appropriate, an Internal audit may also be conducted.

31. In consultation with the Manager, Internal Audit, and Chief Financial Officer or relevant Executive Director, the Director, Governance and Risk will decide whether the matter is investigated internally or by an external investigator.

32. All investigations must be managed according to the Whistleblower Procedures. Refer to the Whistleblower Policy for more information.

33. 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.

False, trivial or vexatious allegations

34. 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.

Counselling and disciplinary action

35. If an allegation of fraud or dishonest behaviour is substantiated by the investigation, the individual must be advised of those findings and given an opportunity to respond.
36. The Chief Financial Officer and the Executive Director, People, Culture and Safety, together with the relevant Executive Director (if an employee), or Executive Director, Member, Volunteers and Regional Operations and relevant Central Council President (if a Member) must determine appropriate disciplinary arrangements, taking into account the individual's response.
37. Disciplinary action will be appropriate and proportionate and may include: termination, suspension, formal counselling, and a requirement to repay money or return misappropriated items.
38. The Senior People and Culture Business Partner will support the appropriate manager to take the required counselling or disciplinary action, according to the Counselling and Disciplinary Policy.

Record keeping

39. The Director, Governance and Risk or Executive Director People, Culture and Safety will manage confidential records of all suspected and confirmed fraud and dishonest behaviour within the Society's Integrated Risk Management System or Personnel files as appropriate.
40. The Manager, Internal Audit will maintain the fraud register in the Society's Integrated Risk Management System (IRMS). The register will contain a summary of all allegations/incidents treated as suspected fraud following an initial assessment, including information about whether the instance has been substantiated.

Protecting those reporting

41. Any individual making an allegation in good faith in accordance with this policy will not be subject to any detrimental or adverse action. Any detrimental or adverse action against a person making an allegation in good faith will not be tolerated.
42. If an individual making an allegation feels that they have been disadvantaged in any way, this should be reported to the Director, Governance and Risk.
43. Eligible Whistleblowers who make a Qualified Disclosure will have the Whistleblower Protections available under the Whistleblower Policy.

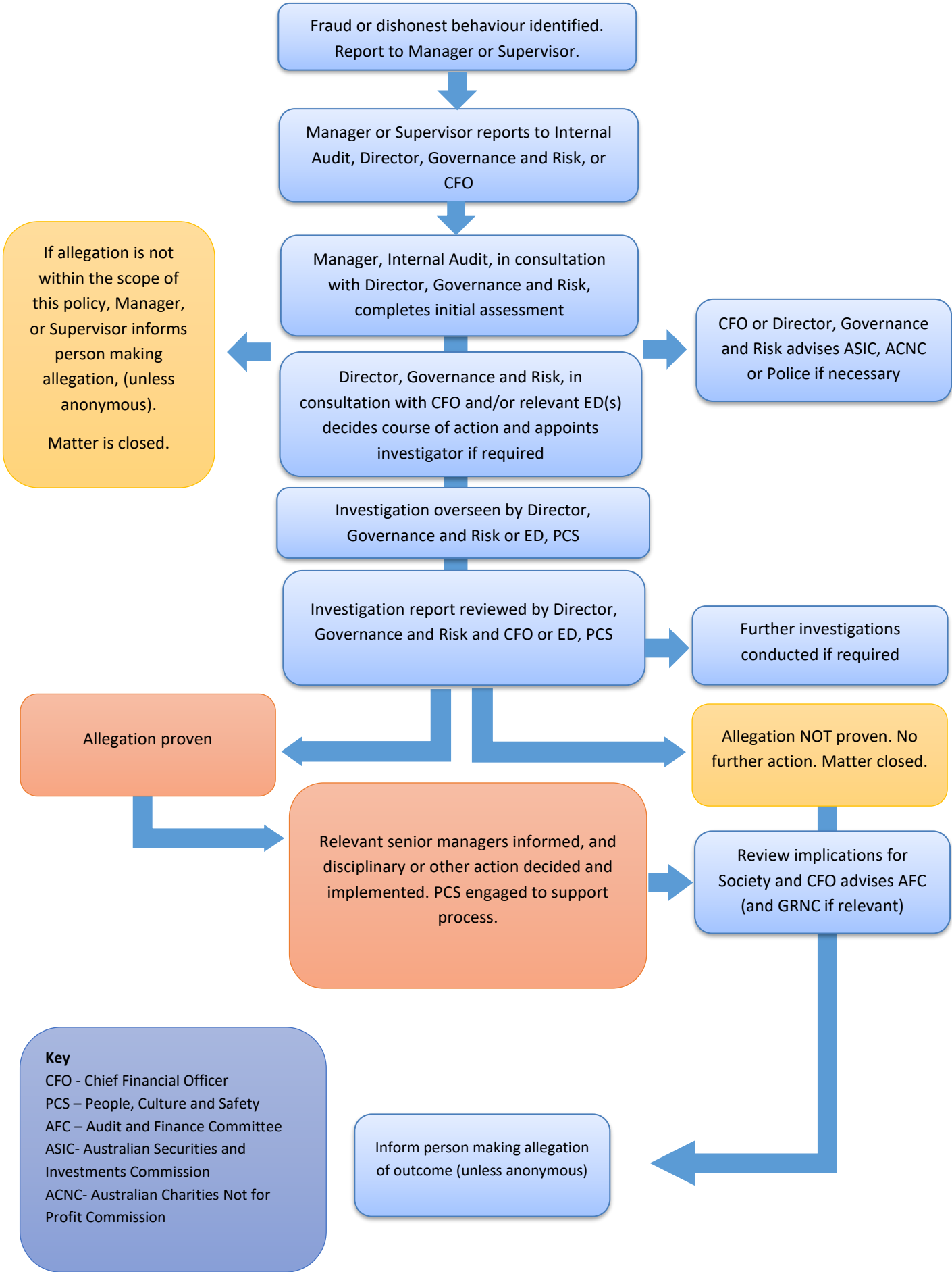
Confidentiality

44. 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.
45. The Society will take steps to ensure that confidentiality is maintained during and after the investigation of an allegation, unless disclosure is required by law or this policy.

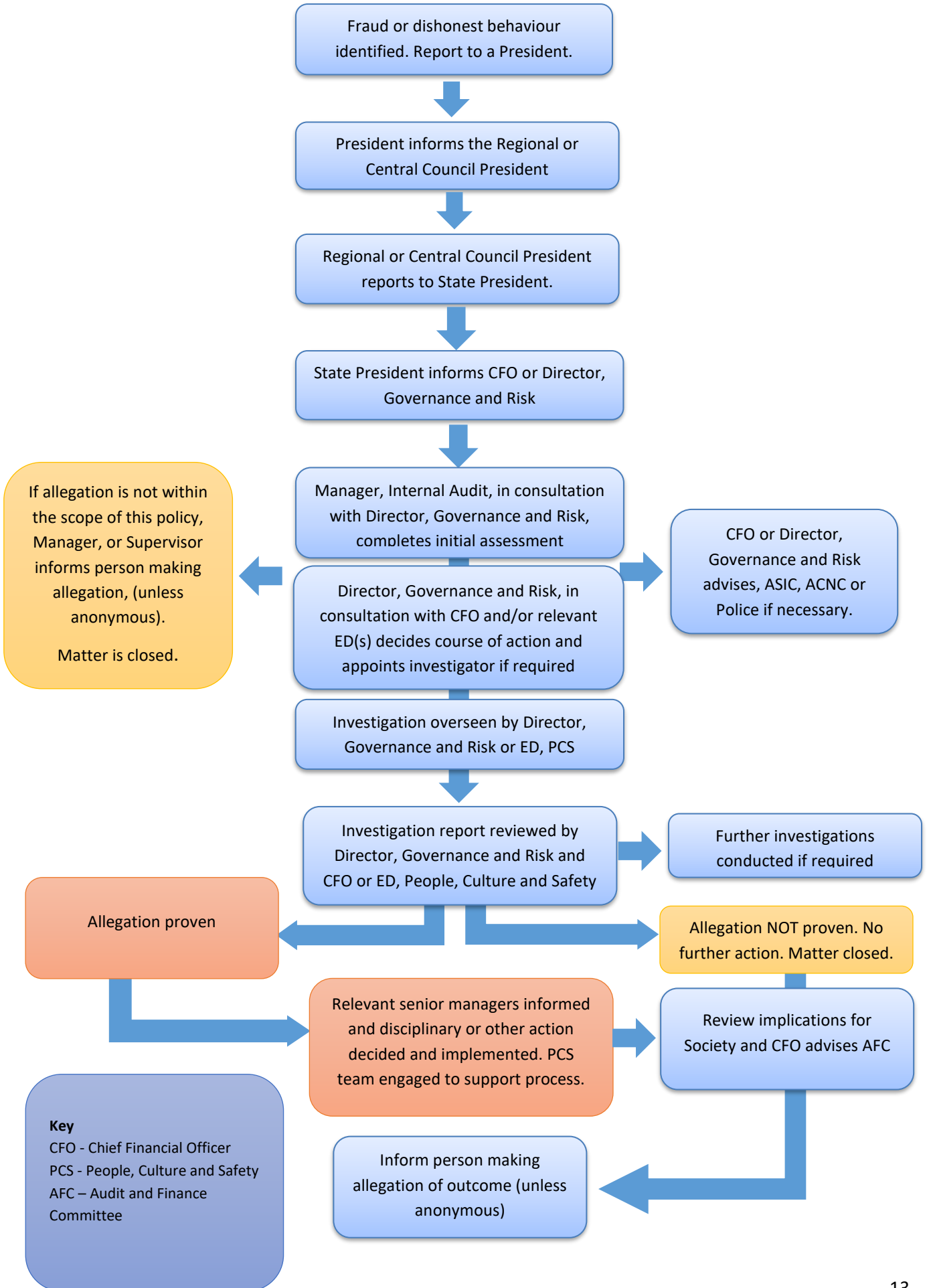
Continuous improvement and prevention

46. 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.
47. 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 recurrence.

Attachment A: Allegations Flowchart- employees and volunteers



Attachment B: Allegations Flowchart- members



Appendix 3: 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.

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 expect 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 write 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 been supplied. • 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.

<p>Serious waste of Society money or resources</p>	<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.
<p>External money laundering</p>	<ul style="list-style-type: none"> • Receiving cash donations which the Society is subsequently asked to return by cheque.
<p>External fraud</p>	<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.