

Interplast Australia & New Zealand

Anti-Fraud and Anti-Corruption Policy

Policy Status:
Approved

Initial CEO Endorsement:	26 March 2019
Board Approval Date:	15 June 2023
Last Review Date:	15 May 2023
Future Review Date:	01 July 2025
Frequency of Review:	2 years
Policy Owner:	Head of Finance

Revisions to Policy

Significant Changes	Endorsed by CEO	Approved by Interplast Board
Transferred from “Anti-Fraud and Anti-Corruption Policy Approved 26 March 2019”	26 March 2019	
Update of definitions to include: Collusive Practice Coercive Practice Obstructive Practice Expanded policy statement in accordance with stronger focus on risk management within the organisation.	15 May 2023	23 June 2023
Updated into new template only	5 June 2024	

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Section 1: Purpose

The Anti- Fraud and Anti-Corruption Policy sets out Interplast Australia & New Zealand's (Interplast's) policy regarding the prevention and investigation of suspected misconduct and dishonesty. The purpose of this policy is to:

- promote a zero-tolerance approach towards fraud and corruption
- clarify acts that are considered fraudulent or corrupt
- identify the steps that all employees, contractors and volunteers must take when a suspected fraudulent or corrupt activity has been identified; and
- outline the role of management in investigating and taking legal action regarding suspected fraudulent activity.

Section 2: Scope

The Anti- Fraud and Anti-Corruption Policy applies to all Interplast personnel, observers accompanying an Interplast activity, and partner organisations engaged by Interplast.

Section 3: Policy

Interplast is committed to protecting funds and other property entrusted to it by donors, from attempts by members of the public, contractors, consultants, volunteers, partner organisations, direct beneficiaries, staff or Board members to gain financial or other benefit by deceit. Interplast will take all reasonable steps to prevent fraud and corruption and will act promptly when actual or suspected fraud is identified.

Interplast maintains a 'zero tolerance' attitude towards fraud and corruption which means Interplast is committed to the highest standards of corporate governance, fiduciary duty, responsibility and ethical behaviour.

All Interplast personnel are responsible for taking all necessary and appropriate steps to prevent, deter and detect fraud, bribery and corruption within their areas of responsibility.

Interplast personnel must consider fraud, bribery, and corruption risks at the outset of any new activity and take practical steps to mitigate those risks.

Appropriate screening activities must be carried out for all Interplast personnel and partners, in accordance with relevant policy and procedures.

Interplast personnel must ensure third parties working with Interplast are made aware of and understand their obligations under this policy. Where contractual relationships exist, agreements must include a clause requiring partners to comply with this policy and report and act against fraudulent or corrupt activities which occur in their organisation, including but not

limited to fraud, corruption, theft, financing of terrorism and collusive, coercive or obstructive practices.

All complaints or allegations of fraud, bribery or corruption must be reported and investigated. All illegal or criminal acts will be reported to the appropriate authorities.

Interplast recognises that it has a responsibility to keep donors fully informed and promptly updated on any suspicion of fraud relating to their funds in accordance with accreditation or service agreement requirements. Interplast may also consider notifying other parties if the incident could potentially result in reputational damage.

All breaches of this policy, or where parties mislead or hinder investigations into potential violations must be reported to the Chief Executive Officer. Reporters may make use of the mechanisms provided in the Whistleblowing Policy.

Interplast is committed to ensuring all allegations are dealt with in a fair, transparent, open and timely manner and that no one suffers any detrimental treatment for refusing to take part in corrupt activities, or because of reporting in good faith their suspicion that an actual or potential offence has taken place.

Breaches of this policy may result in disciplinary action, contract termination and/or force of law.

Section 4: Monitoring and Review of this Policy

This policy will be monitored and reviewed at intervals as indicated in this policy and following the process outlined in Interplast's Policy Framework.

The Chief Executive Officer is ultimately accountable to the Board for managing and maintaining this policy and is responsible for the implementation of this policy. The Board is responsible for adopting this policy.

The Head of Finance is accountable to the Chief Executive Officer for ensuring the currency of this policy and all supporting procedures and relevant manuals and has responsibility for operationalising the policy.

Where compliance issues are identified, they will be addressed promptly. The Chief Executive Officer is responsible for taking any recommended amendments to this policy to the Interplast Board for its approval.

Section 5: Related Documents and Legislation

Interplast adheres to the following Australian legislation and standards:

- Commonwealth Fraud Control Guidelines March 2011

- *Criminal Code Act 1995* (Part 7.3)
- DFAT Head Agreement
- Australian Government Investigations Standards (AGIS)
- Fundraising Institute of Australia Code of Conduct.

In alignment with the ACFID Code of Conduct, Interplast is committed to minimising any risks of wrongdoing, corruption, fraud, bribery or other financial impropriety among its Board, paid staff, contractors, volunteers and partner organisation (8.2 – Resources ACFID Code of Conduct).

Name of document/legislation	Location/hyperlink
Criminal Code Act 1995 (Part 7.3)	https://www.legislation.gov.au/
Commonwealth Fraud Control Guidelines March 2011	https://www.ag.gov.au/integrity/publications/commonwealth-fraud-control-framework
Fundraising Institute of Australia Code of Conduct.	https://fia.org.au/fiacode/
Whistleblowing Policy	Interplast Key Documents

Section 6: Definitions

Word / Phrase	Definition
Personnel	<p>Personnel includes all employees, consultants, volunteers, Board Directors, Committee members, Working Group members and Ambassadors that are engaged by Interplast to perform the work of Interplast.</p> <p>Volunteers include both professional (e.g. administrative roles) and medical volunteers (e.g. surgeons, anaesthetists, nurses or allied therapists), students, interns, or any other person who has entered into a volunteer arrangement or agreement with Interplast.</p>
Observer	<p>Observers are individuals accompanying an Interplast program, delivered by volunteers in a partner country (e.g. representing a donor organisation or students on an observational placement).</p> <p>Observers do not have a clinical role but may assist the clinical team by completing tasks related to program delivery.</p>
Partner	<p>Partner includes organisations that work with Interplast to implement a joint project with mutually agreed outcomes, and/or</p>

	<p>with whom Interplast has a signed partnership agreement and/or memorandum of understanding.</p> <p>Partner organisations may or may not be recipients of funds through Interplast.</p>
Beneficiary	<p>Beneficiary 1) a patient receiving treatment through an Interplast activity (this may include a consult only, surgery, allied health treatment or other clinical care, and could be provided by an Interplast volunteer, or a local partner clinician during an Interplast activity), or 2) local partner personnel participating in training delivered by Interplast.</p>
Stakeholder	<p>Stakeholders include all personnel, observers, partners, beneficiaries and supporters, community members in the country where we work, funders, international development peers and organisations, or any other individuals or organisations that connect with Interplast.</p>
Fraud	<p>Dishonestly obtaining a benefit, or causing a loss, by deception or other unlawful and/or unethical means. Fraud can cover many activities including, but not limited to, the following:</p> <ul style="list-style-type: none"> • forgery or alteration of documents (e.g. cheques, bank drafts, bank statements, time sheets, invoices, quotations, agreements) or bank accounts belonging to Interplast • misrepresentation of information on documents • misappropriation of funds, securities, supplies or other assets • theft, disappearance or destruction of any asset • impropriety in the handling of money or financial transactions • authorisation or receipt of payment for goods not received, services not performed, travel and entertainment expenses not incurred, and/or hours not worked • using Interplast funds to pay for personal expenses • fictitious reporting of receipts from suppliers or shipments to customers • inappropriate use of the organisation's records and disclosing confidential and proprietary information to outside parties, without consent • unauthorised use of inventory, furniture, fixtures, equipment or other assets • bribery, facilitation payments and receipt of kickbacks • any apparent violation of Federal, State or local laws related to fraudulent activities; and any similar or related activity.

Corruption	The offering, giving, soliciting, or acceptance of an inducement or reward that may improperly influence the action of a person or entity. Examples of corruption include bribery, conspiracy, extortion
Theft	The unauthorised taking of anything of value that belongs to another individual or entity
Collusive Practice	An arrangement among two or more parties designed to achieve an improper purpose, including but not limited to, influencing improperly the actions of another party
Coercive Practice	The act of impairing or harming, or threatening to impair or harm, directly or indirectly, any party of the property of the party to influence improperly the actions of a party
Obstructive Practice	The deliberate destruction, falsifying, altering or concealing of evidence material to an investigation or making false statements to investigators in order to materially impede a duly authorised investigation into suspected cases of fraud, corruption, theft, collusive or coercive practice, money laundering or finance of terrorism
Financing of Terrorism	The provision or collection of resources, by any means, directly or indirectly, with the intention that they should be used or in the knowledge that they are to be used, in full or in part, to benefit