

TITLE: FINANCIAL WRONGDOING & CORRUPTION CONTROL POLICY			
APPROVED BY:	Organisation		
POLICY OWNER:	Chief Financial Officer	POLICY DELEGATE:	Shannan Scott, Head of Risk
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ASSOCIATED WVI POLICY:	Partnership Management – Anti-Corruption Policy		

THE FINANCIAL WRONGDOING & CORRUPTION CONTROL POLICY MEANS we are trusted stewards.

1. OVERVIEW

1.1 Purpose

The diversion of resources or the misuse of power compromises our values and our accountability to children, communities and donors around the world. Suggestions that World Vision Australia (WVA) is linked to “financial wrongdoing” (which includes fraud, bribery, corruption, money laundering and terrorist financing) can be damaging to reputation – undermining the morale of staff and the trust and support of beneficiaries, partners, the wider public and donors. All forms of financial wrongdoing pose legal risks both for the organisation and the individuals involved. We must act, and be seen to act, in a way that is honest and transparent, regardless of what may be accepted as common in context.

This policy supports existing policies and standards (such as Code of Conduct), reinforcing World Vision Australia’s commitment to foster an organisational culture and values of “We are Christian” and “We are Stewards” in which financial wrongdoing is never acceptable. It further clarifies standards of conduct for the prevention of financial wrongdoing and provides a common foundation for the development of procedures to manage financial wrongdoing risk across the organisation.

1.2 Scope

Who - The Policy applies to any person who is employed by or who represents WVA. This includes all employees (engaged in any capacity – permanent, temporary, full time, part time, casual), students, secondees, volunteers, contractors, agency employees and our Board Members (also known as Directors).

For the purpose of this policy those covered by the scope are collectively referred to as “employees” in the document.

Suppliers are covered by this policy to the extent of the requirements set out in the Suppliers Code of Conduct.

Where - When and where this policy applies extends to any location that is our workplace at any time we are representing WVA. This can include but is not limited to:

- at an office or other premises including WV/government/donor/supporter locations;
- when working from home or remotely; and
- at locations within Australia or elsewhere in the world.

In summary in any workplace, location or situation in which you are performing work, representing World Vision or you are there because of your employment or engagement with WVA.

2. POLICY

- 2.1 WVA has a zero tolerance to **financial wrongdoing** as reflected in our Risk Appetite settings. This means that all forms of financial wrongdoing is prohibited.
- 2.2 No WVA employee, or any third party acting on behalf of WVA or dealing with WVA shall commit financial wrongdoing or any other corrupt practice, fail to report financial wrongdoing or fail to manage the risk of financial wrongdoing.
- 2.3 Payments otherwise prohibited by this policy should be considered only if there is immediate threat to personal safety in which case the payment must be immediately reported to management and clearly identified in accounting records as such.
- 2.4 WVA will conduct **Financial Wrongdoing & Corruption Risk Assessments** to identify the risks relevant to our operations, as well as any weaknesses or deficiencies in internal or external controls. This will include project specific risk assessments for field-based programs. Details on how to conduct these Risk Assessments are set out in our Financial Wrongdoing & Corruption Control Guidelines.
- 2.5 WVA will develop **Financial Wrongdoing & Corruption Control Strategies** that articulate how identified risks will be managed across WVA and in relation to WVA funded programs. Our control strategies include:
- preventative controls such as awareness training, employee screening, third party due diligence activities, segregation of duties, annual leave requirements and other risk management practices.
 - detective controls such as project monitoring, fraud reporting, a central fraud register, and internal audit activities.
 - corrective controls will be articulated in specific action plans that designed to address the root causes of the financial wrongdoing.
- These are outlined in more detail in the Financial Wrongdoing & Corruption Control Guidelines.
- 2.6 WVA will **implement controls** that will remove the opportunity and motivation for fraud and corruption. WVA will undertake ongoing monitoring and assessment activities to **test and review** the operation and effectiveness of these controls. Further information on controls and control testing activities is set out in our Financial Wrongdoing & Corruption Control Guidelines.
- 2.7 WVA will provide mechanisms for the **reporting of suspected and actual financial wrongdoing**, including a complaints mechanism and a Protected Disclosure (whistleblowing) mechanism that facilitates reporting in a confidential manner without fear of recrimination or reprisal.
- 2.8 WVA will **investigate** all alleged incidences or reports of financial wrongdoing **and will address** the identified **root causes**. Details on investigation processes, including specific requirements for incidents involving DFAT funding are provided in our Financial Wrongdoing & Corruption Control Guidelines.
- 2.9 Where financial wrongdoing is substantiated, WVA will apply appropriate disciplinary action and /or contractual remedies:
- a) Employees will be subject to disciplinary action up to and including termination of employment
 - b) Board members who fail to comply with this policy are subject to removal
 - c) Third parties who fail to comply with this policy will have their agreements and/or contracts with WVA terminated.
 - d) WVA may also seek the recovery of misappropriated funds or assets or prosecution of offenders including referral to law enforcement authorities or other legal remedies.
- 2.10 WVA will ensure that all employees are educated in the management of financial wrongdoing as part of the employee onboarding process and through refresher training provided on a regular basis. Board members, volunteers and third parties that engage with WVA are to be made aware of this policy.

3. POLICY BREACHES

3.1 While WVA has a zero tolerance to financial wrongdoing, we do understand that not all financial wrongdoing can be avoided or prevented. Where breaches do occur, WVA is committed to acting quickly and appropriately to address them.

3.2 **Reporting a policy breach** – WVA has obligations arising from the matters covered in this policy to report both internally and externally in relation to a breach of this policy. Failing to do so can have serious implications for WVA in relation to our ability to operate as a business and as a charity. To comply with this, any person who identifies a breach to this policy must report it using one of the following process:

- By raising with your immediate or any other Manager/Chief within WVA.
- By raising with the Head of Risk - via the 'Financial Wrongdoing/ Corruption Disclosure Form' [Financial Wrongdoing Corruption Disclosure Form.docx](#).
- Via WVA's Protected Disclosure (Whistleblower) procedures including via the nominated independent, confidential external service (refer to WVA Hub detail on reporting via this mechanism)
- In relation to donor funds in the field, raise the fraud or suspected fraud via the 'Financial Wrongdoing/ Corruption Disclosure Form' and it will be shared with the appropriate person within the Field Impact team for inclusion on the Central Fraud Register.

3.3 **Reporting to DFAT** – Any suspected or real incidents of fraud involving DFAT funding must be reported to DFAT within 5 business days of WVA becoming aware of the incident. The Field Impact team are responsible for this reporting. Details on the process used for this reporting are outlined in the Financial Wrongdoing & Corruption Control Guidelines

3.4 Reporting related to Financial Wrongdoing is provided to the Audit & Risk Committee on a quarterly basis.

4. POLICY DEFINITIONS

Item	Definition
Financial Wrongdoing	Behaviour that is illegal or immoral with regard to financial transactions. It is used in this Policy as the overarching term that Includes fraud, bribery, corruption, fraud, money-laundering, terrorist financing and violation of sanctions by the Australian government.
Fraud	Dishonestly obtaining or providing a benefit, or causing a loss, by deception or other means, and including incidents of attempted, alleged or detected fraud. It is a sub-set of financial wrongdoing and can also include but is not limited to instances of bribery and corruption, and the making of facilitation payments.
Corruption / corrupt practices	Dishonest activity in which a person acts against the interests of WVA / WVI by abusing a position of trust in order to achieve some personal gain or advantage. It can often involve public servants, politicians, or corporations demanding or misusing money in exchange for services or lucrative deals. In our context, it may relate to the bribery of foreign officials to help facilitate project implementation.
Bribery	Bribery is the promise or delivery of a benefit in order to influence the receiver's behaviour. Usually the behaviour expected of the person receiving the bribe is illegal or unethical in nature and would not be something they would usually do. Bribing or attempting to bribe a foreign public official is a serious crime. Australian companies or individuals that bribe an official in a foreign country can be prosecuted under Australian law and the laws of foreign countries. ¹
Facilitation payment	Facilitation payments are low-value payments designed to speed up routine government actions. These are sometimes referred to as 'grease payments'. Facilitation payments create incentives for public officials to slow down processes and create obstructions. Facilitation payments leave organisations open to exploitation and reputational risks. They undermine local laws and entrench corrupt practices. ²
Risk Appetite Statements	Risk Appetite Statements describes World Vision Australia's attitude toward risk taking in relation to our business strategy.

¹ DFAT Fraud Control Toolkit for Funding Recipients, Annex 5: Bribery & Facilitation Payment Factsheet: [Fraud Control Toolkit for funding recipients \(dfat.gov.au\)](#)

² As above

5. POLICY REVISION HISTORY

Revision Date	Revision Number	Summary description of revision	Section(s) Changed	Approved By
February 2014	1	Updates to reflect changes in structure of organisation, and general 'tidy up'	Throughout	Chief Financial Officer
November 2014	2	Policy re-written	All	Chief Financial Officer
August 2016	3	Policy re-written to reflect the formalisation of a zero tolerance for financial wrongdoing, fraud and corruption and also to reflect changes in the structure of the organisation	All	Chief Financial Officer
November 2016	4	Minor amendments	6.2	Chief Financial Officer
August 2018	5	Policy rewritten to simplify, and also as part of two-yearly review requirement	All	Chief Financial Officer
April 2020	6	Policy updated to incorporate suggested changes from ACFID following their review. Includes change in title from Fraud & Corruption Policy	All	Chief Financial Officer
June 2020	7	Policy updated to more clearly define financial wrongdoing and fraud and apply throughout document	All	Chief Financial Officer
September 2020	8	Reviewed in response to Internal Audit (EY) recommendations, but no changes required	All	Chief Financial Officer
February 2023		Re-write of policy to better align to the World Vision Partnership Management Anti-Corruption Policy and to streamline by transition into the new WVA Policy template	All	Chief Financial Officer

Appendix A – Supporting Information to the Financial Wrongdoing & Corruption Control Policy

In addition to the information contained in this policy there are several external references and internal policies, procedures and resources that can be used or referenced in conjunction with this policy. These documents include (but are not limited to):

Standard or Industry Reference	Summary of what these cover
DFAT Funding Orders	Deed of Agreement between DFAT and World Vision Australia for the Australia-NGO Co-operation Program (ANCP) which sets out specific contractual requirements for WVA to abide by in order to maintain DFAT funding. This is renewed on an annual basis.
DFAT Fraud Control Toolkit for Funding Recipients	Provides DFAT’s funding recipients with ways of developing and implementing fraud control strategies that meet DFAT’s contractual requirements.

Policy or Area	Examples of what these cover
World Vision Partnership Management – Anti Corruption Policy	Outlines Anti-Corruption requirements that are applicable across the World Vision partnership
World Vision Australia – Financial Wrongdoing & Corruption Control Guidelines	Details the specific processes and procedures in place to meet the requirements of this policy across WVA and in relation to WVA funded programs.
World Vision Australia – Screening Policy	Sets out the roles, responsibilities and processes involved in the screening of prospective and existing personnel.
World Vision Australia – Code of Conduct	Sets out the standard of behaviour required of all World Vision Australia staff, contractors, volunteers and Board of Directors.
World Vision Australia – Conflicts of Interest Policy	Outlines requirements to ensure that potential conflicts of interest are disclosed, considered and managed appropriately.
World Vision Australia – Protected Disclosure (Whistleblower) Policy	Documents WVA’s approach to ensure that donors, suppliers, partners and staff feel that they can safely report any such misconduct without fear of repercussions.
World Vision Australia – Gifts, Benefits & Hospitality Policy	Sets out WVA’s position on responding to offers of gifts, benefits and hospitality, and providing gifts, benefits and hospitality.
World Vision Australia – Risk Management Framework	Details the approach taken by WVA to the identification and management of all risks across the organisation.
World Vision Australia – Supplier Code of Conduct	Sets out specific legal, ethical, social and environmental standards of conduct which we expect our suppliers to follow.