



Fraud and corruption prevention policy

The Water Well Project (TWWP) will not tolerate any form of fraud or corruption in any aspects of its operations.

PURPOSE

The purpose of this policy is

1. To ensure that all parties are aware of their responsibilities for identifying exposures to fraudulent or corrupt activities and to establish controls and procedures for preventing and/or detecting such activity when it occurs.
2. To provide actionable procedures for staff/volunteers/contractors for where they suspect any fraudulent or corrupt activity.
3. To provide a clear statement to staff/volunteers/contractors forbidding any illegal activity, including fraud and corruption for the benefit of the organisation.
4. To provide assurance that any and all suspected fraudulent or corrupt activity will be fully investigated.

Definitions

For the purpose of this policy, the following definitions apply:

Fraud - Intentional dishonest action to obtain or arrange a benefit by deception or other means.

Examples include but are not limited to:

- Theft such as stealing property, petty cash, gift cards, donations, client funds or corporate assets
- Falsification of records, accounts or documents
- Destroying or concealing accounts or records
- Embezzlement or misappropriation of funding or other assets
- Misuse of assets or property for personal benefit (e.g., disclosing confidential information)
- Forgery or issuing false or misleading statements with intent to obtain financial advantage or deceive.

Corruption - Dishonestly obtain a benefit by misuse of power, position, authority or resources.

Examples include but are not limited to:

- Bribery, extortion & blackmail
- Permitting personal interests to override corporate interests
- Giving or accepting gifts & benefits in return for preferential treatment to the giver
- Collusion, false quotes, false invoices or price fixing
- Manipulating design & specifications or processes for personal gain or to conceal defects
- Complicity in excessive billing or submission of false support documents or concealment of documents
- Falsifying job qualifications or work or safety certifications
- Nepotism (favouring relatives)



- Privacy breaches or data manipulation with intent to cause harm.

POLICY

TWWP will investigate any suspected acts of fraud, corruption or other similar irregularity. An objective and impartial investigation, as deemed necessary, will be conducted regardless of the position, title, length of service or relationship with the organisation of any party who might be the subject of such investigation.

Everyone is responsible for the detection and reporting of fraud and corruption. Any such suspected activity must be reported in writing to the Chair of the Board as soon as practicably possible. The Chair of the Board will coordinate investigations both internal and external.

Any fraud or corruption shall constitute grounds for dismissal. Any illegal activity shall be reported to the police.

Investigation results/outcomes will not be disclosed or discussed with anyone other than those who have a legitimate need to know.

Any person reporting fraud or corruption, or a suspected fraud or corruption activity, shall suffer no penalty in their employment or otherwise. A whistle-blower will be provided anonymity as far as reasonably practicable during and after the resolution of any issue brought to attention by them.

Related Documents (to be developed)

For example,

- (Financial Procedures: Authority to Sign Cheques, Reimbursement of Expenses, Financial Transaction Cards Policy, Cash Management & Income Handling
- Acceptable Use of Equipment Policy
- Staff Recruitment & induction Policy)

Administration

The Board is responsible for the administration of this policy. The policy will be reviewed and revised as needed every two years.

Originally adopted by the Board on: 20 May 2021

Reviewed/revised on:

Next review: by 20 May 2023