

Fraud and Corruption Policy

1. Statement of Intent

Operation Blue is committed to a zero tolerance of fraud and corruption in the operations of Operation Blue Australia and operations of any partner organisation that we serve and/or support.

2. Definitions

Issue	Definition
Fraud	Is an intentional distortion, deceit, trickery, and perversion of truth or breach of confidence, relating to an organisation’s financial, material, or human resources, assets, services and/or transactions, generally for the purpose of personal gain or benefit. Fraud is a criminal deception or the use of false representations to gain an unjust advantage.
Corruption	Is the “offering, giving, soliciting or acceptance of an inducement or reward which may improperly influence the action of any person”.
Bribery	Is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust and may take the form of gifts, loans, fees, rewards or other advantages.
Financial Wrong-doing	Is behaviour that is illegal or immoral with regards to financial transactions and includes bribery, corruption, fraud, money-laundering, terrorism financing and violation of sanctions imposed by the Australian government.
Money Laundering	The process of concealing the origin, ownership or destination of illegally or dishonestly obtained money and hiding it within legitimate economic activities to make them appear legal.
Terrorism Financing	Intentionally providing or collecting funds and being reckless as to whether those funds would be used to facilitate or engage in a terrorist act.

3. Policy

- Operation Blue has a zero-tolerance approach to financial wrong-doing.
- Operation Blue staff shall never take advantage of their position when working with communities, partners or other stakeholders.
- Operation Blue will publicise this policy to all staff and volunteers.
- Operation Blue staff, board and volunteers will be required to commit to honesty and openness and these anti-financial wrong-doing requirements will be included in the staff, board and volunteers' Code of Conduct.
- Partners will be required to maintain a policy that includes the content of the Partner Policy Template on the prevention of Financial Wrong-doing.
- Operation Blue will maintain processes that empower our partners (in Australia and overseas) to develop robust financial systems and will ensure that donations received by Operation Blue.

4. In the Event of Financial Wrong-doing Taking Place:

- Instances of fraud will be reported to any relevant funding body within five (5) days or according to the agreement with the funding body, whichever is the least, and may include the involvement of the relevant police.
- Where Operation Blue staff or volunteers are suspected of fraud or corruption the Operation Blue Board will be informed within five (5) days and a review process will be implemented and may include the involvement of the relevant police.
- In the event of other forms of Financial Wrong-doing, relevant funding partners and the Operation Blue Board will be advised within five (5) days of the matter coming to light. Steps to be taken in relation to such matters will be determined by either or both the funding body and/or the Operation Blue Board.

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- Actions may include the appointment of an independent forensic auditor to examine the particular matter and make recommendations in regard to actions needing to be taken.