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Fraud Risk Management Policy & Procedure

APPROVED BY: Pathways SouthWest Board of Management

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VERSION: 3

THIS POLICY & PROCEDURE APPLIES TO: Pathways SouthWest Board of Management, Staff, Students, Volunteers, Consumers, Carers, other Stakeholders and the General Public

Fraud Risk Management Policy & Procedure

Policy

This policy is to ensure that everyone is aware of their responsibilities for identifying exposures to fraudulent activities and for establishing controls and procedures for preventing such fraudulent activity and/or detecting such fraudulent activity when it occurs.

Procedure

- The Board of Management of Pathways SouthWest has ultimate responsibility for the prevention and detection of fraud and is responsible for ensuring that appropriate and effective internal control systems are in place.
- All managers must ensure that there are mechanisms in place within their area of control to:
 - (i) assess the risk of fraud
 - (ii) induct and educate employees about fraud prevention and detection
 - (iii) facilitate the reporting of suspected fraudulent activities
- All staff share in the responsibility for the prevention and detection of fraud in their areas of responsibility.
- All staff have the responsibility to report suspected fraud. Any staff member who suspects fraudulent activity must immediately notify their line manager or those responsible for investigations. In situations where the line manager is suspected of involvement in the fraudulent activity, the matter should be notified to the next highest level of supervision.
- Any fraud by any staff member can constitute grounds for possible dismissal as per the Disciplinary and Termination Policy and Procedure.
- Fraud prevention accounting procedures shall be incorporated in the organisation's policies related to Cash Management, Credit Card Use, Commercial Transactions, and Investment.
- All complaints of suspected fraudulent behaviour will be investigated using the principles of natural justice.
- Where a prima facie case of fraud has been established the matter shall be referred to police. Any action taken by police shall be pursued independently of any employment-related investigation by the organisation.
- Recruitment strategies shall incorporate fraud prevention;
 - Applicants shall be required to undergo National Police Clearance checks where required by the duties of the position
 - Previous employers and referees shall be contacted
 - Transcripts, qualifications, publications and other certification or documentation shall be validated
- Fraud prevention and detection issues will be included in relevant staff development and induction activities.

Related documents:

Whistleblowing Policy

Authority to Make Payment Policy

Financial Delegation Policy

Compliance Management Policy

Staff Disciplinary and Termination Policy

Petty Cash Policy (in preparation)