



## Fraud, Bribery and Corruption Policy

### 1. What does this Policy do and why do we need it?

This policy **explains** how we maintain a zero-tolerance approach to fraud, bribery and corruption.

At Save the Children, we work to **prevent, find and respond** to fraud, bribery and corruption across all our work.

Fraud, bribery and corruption can weaken client, community and donor trust in us and **reduce our impact** for children.

### 2. What are the key terms?

**Bribery** is offering, giving, asking for or accepting any item of value as a way of influencing someone's actions.

**Corruption** is the misuse of power, position or funds (this can include a conflict of interest where you have competing interests or loyalties).

**Fraud** is dishonestly getting a benefit (like money, objects, power or information) or causing a financial loss.

**Save the Children** is Save the Children Australia including 54 Reasons, its Pacific Country Offices and its subsidiaries.

**Third Parties** are people or organisations working with Save the Children. They can include current and potential program participants, customers, partners, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

### 3. What is my responsibility?

- We consider fraud, bribery and corruption to be serious misconduct and take a zero-tolerance approach.
  - > Everyone working at or with Save the Children is responsible for preventing, finding and reporting fraud, bribery and corruption.
- When a new person is recruited, police and background screening checks must be carried out in accordance with our *Recruitment Standard*.
  - > All new starters must complete compulsory fraud awareness training within three months of commencing employment.
- We must all take steps to reduce the risk of fraud, bribery and corruption, including:
  - > Checking with your manager or a member of the [Enterprise Risk](#) team if you are unsure about what may be acceptable behaviour – our workplace is a safe space for you to raise concerns or ask questions.
  - > Carrying out a [risk assessment](#) and documenting steps you will take to reduce the risk of fraud, bribery and corruption in your programs and activities.
  - > Regularly reviewing any steps being taken to reduce the risk to check that they are still working well.
- We ensure Third Parties are aware of, and understand, their obligations under this policy:
  - > We will keep this policy on the Save the Children website.
  - > Where we have a subcontracting agreement, that agreement must require the contractor to comply with this policy and prevent, report and respond to any fraudulent or corrupt activities in their organisation.
- If you become aware of any behaviour in our organisation that you think may involve fraud, bribery or corruption, you have a responsibility to report it as soon as you can. You should do this by:
  - > speaking to your supervisor or another manager; **and**
  - > reporting it using our Incident Management System ([Donesafe](#)); **and**

> also reporting any suspected criminal behaviour to the police, unless there are good reasons not to (please read the [Incident Management Procedure](#)).

- If you have concerns that your supervisor or line managers may be engaging in fraud, bribery or corruption, please contact the [Head of Enterprise Risk](#) or report the concerns anonymously using the channels in our [Whistleblower Policy](#).
- If you genuinely report behaviour that you suspect may involve fraud, bribery and corruption, you will not face any negative consequences, even if it turns out that there was no wrongdoing.
- Our Executive team will provide an annual declaration that:
  - > our fraud controls are appropriate and effective; and
  - > any reports of fraud, bribery or corruption are taken seriously, investigated thoroughly and steps taken to stop it from happening again.

#### 4. What will happen next?

- All reported incidents, and related data held within our Incident Management System ([Donesafe](#)), will be treated **confidentially** – only people who need the information to do their job will see it.
- All reported incidents of fraud, bribery and corruption will be **investigated** and we will take appropriate action, including disciplinary, legal or other actions, if they are found to be true.
- **You must act quickly** to understand what might have gone wrong and to help to prevent similar incidents from happening again.
- We will **keep our donors fully informed** about any suspicion of fraud relating to their funds in line with accreditation or service agreement requirements.

#### 5. Who does this Policy apply to?

This policy applies to all Save the Children representatives, including its employees, contractors, directors and volunteers.

#### 6. What are the related documents (found in our [Policy Centre](#))?

- *Code of Conduct*
- *Conflict of Interest Policy*
- *Donation Acceptance and Refusal Policy*
- *Fraud Investigation Procedure*
- *Gifts and Benefits Policy*
- *Incident Management Procedure*
- *Recruitment Standard*
- *Risk Management Policy*, and
- *Whistleblower Policy*.

#### 7. Where can I get help?

Please contact the Enterprise Risk team ([fraud@savethechildren.org.au](mailto:fraud@savethechildren.org.au)) for further advice or support.

Version	Author	Approved by Executive	Approved by BPRC	Review Date
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