

Anti-Corruption Policy

Purpose and Scope

SC Australia maintains a ‘zero tolerance’ for corruption by putting in place preventative and detective measures to minimise its impact, treating all allegations seriously and responding appropriately to provide the highest levels of accountability to its stakeholders.

This policy applies to any actual or suspected corrupt activity (refer appendix), involving employees, officers, beneficiaries, volunteers, partners or other associated persons in Australia and in countries where SC Australia carries out operational and funding activities. It is recognised that corruption is not solely limited to illegal acts such as bribery and fraud but also includes other activities which may not be illegal such as favouritism and conflicts of interest.

Policy Statements

1. Corruption risks **must** be included in all risk assessments.
2. Appropriate screening activities (refer appendix) **must** be carried out prior to establishing relationships with partners, beneficiaries, volunteers and employees and be updated at least every six months.
3. Program Managers **must** include in agreements a clause requiring partners to comply with this policy and report and act against any corrupt activities which occur in their organisation.
4. Activity **must** cease immediately and any suspected or detected corrupt activities reported in line with SC Australia incident procedures and donor specific requirements. All illegal or criminal acts will be reported to the appropriate authorities.
5. All complaints or allegations of corruption **must** be Investigated.
6. Business Unit leaders **must** lead by example and ensure teams are provided with anti-corruption; awareness, sensitisation and training.
7. Department heads **must** provide an annual declaration that appropriate internal controls are implemented and to their knowledge corruption hasn’t taken place.

All breaches of this policy or where parties mislead or hinder investigations into potential violations must be reported to the Risk Support Team and may result in disciplinary action, contract termination and/or force of law. Reporters may make use of the mechanisms provided in the Whistle-blower Policy.

SC Australia is committed to ensuring all allegations are dealt with in a fair, transparent and open manner and that no one suffers any detrimental treatment for refusing to take part in corrupt activities, or because of reporting in good faith their suspicion that an actual or potential offence has taken place. In certain exceptional situations, it is possible that actions that might otherwise be contrary to this policy may need to be made to respond to immediate threats to staff safety and security. Where this is done, the breach must be reported as soon as possible.

Previous Version	Current Version	Comments	Author	Approved by Executive	Approved by BPRC	Review Date
4.3	4.5	Scheduled review	Head of Risk Support	Sep 2019	18/9/19	Q3 2021

Related Policies

Conflict of Interest, Procurement and Payment, Recruitment, AML/CTF, Risk Management, Donor Acceptance and Refusal, Gift in Kind, Whistle-blower.

Appendix – Examples of Corrupt Activities.

Corruption includes a broad range of activities such as the following:

- Forgery or alteration of documents (cheques, bank statements, invoices, agreements, etc.) or bank accounts.
- Submitting or authorising incorrect timesheets and/or leave requests (e.g. annual, personal, carers or cultural leave).
- Misrepresentation of information in documents.
- Misappropriation of funds, supplies or assets.
- Theft, disappearance, or destruction of assets.
- Improprieties in the handling or reporting of money or financial transactions.
- Authorising or receiving payments for goods not received or services not performed.
- Authorising or receiving payment for hours not worked.
- Inappropriate use of SCA's records and disclosing confidential and proprietary information to outside parties.
- Offering money, services, or other valuables to persuade another individual to do something in return.
- Where money (or other resources) are unlawfully demanded from another using force or the threat of force.
- An economic crime involving some form of deceit, trickery, or false pretence.
- The use of a person's position to favour friends or family over strangers.
- A conflict between private & public 'interests'.

Figure 1 - Corruption Word Cloud



Appendix – Screening Requirements.

For Partners refer to the Donor Acceptance Policy and Partnership engagement process.

For Volunteers and Employees refer to the Recruitment and Volunteer Policies.

Beneficiaries screening requirements are under development.