

# **Anti-Fraud, Bribery & Anti-Corruption Policy**

**Daughters of Our Lady of the Sacred Heart  
Overseas Aid Incorporated**

# **Anti-Fraud, Bribery & Corruption Policy Statement**

## **Introduction**

The Daughters of Our Lady of the Sacred Heart Overseas Aid Incorporated fund was granted a Certificate of Incorporation on the 29th March, 1989 under the Associates Incorporation Act, 1984.

The objectives of the Association are to provide for the relief of people in countries which are for the time being, certified by the Minister for Foreign Affairs and including relief of people in the Phillipines and Kiribati.

The DOLSH Aid Inc. was established by the Daughters of Our Lady of the Sacred Heart. The Daughters of Our Lady of the Sacred Heart is an international Congregation. The Congregation was founded in France in 1874 by Jules Chevalier. The sisters work in over 27 different countries in the world in the fields of community health, education of women and children, social work, aged care, other areas of social service such as alcohol and drug rehabilitation and the relief of poverty. All the projects funded by the DOLSH Aid Inc. are at the service of developing countries and their peoples.

## **Our Vision Statement**

The Daughters of Our Lady of the Sacred Heart Overseas Aid Incorporated recognize the dignity and value of every human person, regardless of creed, culture or ethnicity. We are committed to respect the rights of all persons, especially women, children, youth and those whose rights and dignity are devalued or at risk.

## **Policies to combat Fraud and Corruption.**

### **1 Introduction**

**1.1** The OLSH Overseas Aid Inc. is determined to maintain its reputation as organization which will not tolerate fraud, bribery, corruption or abuse of position for personal gain, wherever it may be found in any area of the activity of OLSH Overseas Aid.

**1.2** The purpose of this Policy Statement is to set out for members, officers and beneficiaries of OLSH Overseas Aid Inc. the main principles for countering fraud, bribery and corruption. The policy links closely to the Vision of OLSH Overseas Aid and supports its values of openness, honesty, integrity and performing to the highest of standards.

**1.3** The Policy statement includes:-

- the scope;
- the culture and the stance against fraud and corruption;
- how to raise concerns and report financial malpractice;
- the principle of having an OLSH Overseas Aid Inc. anti-fraud, bribery & corruption strategy;

- the responsible officer.

**1.4** Elected Members, and officers, of the organization should play a key role in counter-fraud initiatives. This includes providing a framework within which counter-fraud arrangements will flourish, and the promotion of an anti-fraud culture across the whole of the organization. This should provide a sound defence against internal and external abuse of donated funds.

**1.5** Part of the External Auditor's statutory duties are to ensure that Overseas Aid Inc. has in place adequate arrangements for the prevention and detection of fraud and corruption.

## **2. Definition of Fraud, Bribery & Corruption**

**2.1** The Chartered Institute of Public Finance and Accountancy (CIPFA (UK)) defines Fraud as the

*"intentional distortion of financial statements or other records by persons internal or external to the organisation, which is carried out to conceal the misappropriation of assets or otherwise for gain."*

**Fraud** is described as the willful or dishonest misuse of OLSH Overseas resources, including acts of dishonesty, deception, or of omission, the improper use of influence or position and/or the improper use of information. Some examples of fraudulent conduct may include:

- Theft of assets
- Unauthorised and/or illegal use of assets, information or services for private purposes
- Misappropriation of funds
- Falsification of records for improper advantage
- Taking unrecorded leave.
- False representation
- Failure to disclose information where there is a legal duty to do so
- Abuse of position

**2.2** CIPFA (UK) defines **Corruption** as the

*"offering, giving, soliciting or acceptance of an inducement or reward which may improperly influence the action of any person."*

**2.3. Theft** includes the unauthorised removal or use of OLSH Overseas Aid property or an employee's property or the property of any other person or entity which is located at OLSH Overseas Aid premises.

"a person shall be guilty of theft if she/he dishonestly appropriates property belonging to another with the intention of permanently depriving the other of it"

**2.4** CIPFA (UK) defines **Bribery** as

*"an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage"*

**2.5 Responsible Officer** is a person appointed by the Annual General Meeting of OLSH Overseas Aid Inc. who is authorised to receive and act upon information forwarded from Informants. Responsible Officers are currently the President and Vice-President of OLSH Overseas Aid Inc.

### **3 Scope**

**3.1** The Policy Statement applies to elected members, co-opted members of committees, and all officers (full time, part time, temporary and casual) who work for the OLSH Overseas Aid. The term "officer" includes all types of employees of OLSH Overseas Aid.

**3.2** OLSH Overseas Aid Incorporated expects that individuals and organisations (e.g. partners, suppliers, contractors, and service providers) that it deals with will act with integrity and without thought or actions involving fraud, bribery and corruption. Where relevant, OLSH Overseas Aid Inc. will include appropriate clauses in its contracts about the consequences of fraud, bribery and corruption; evidence of such acts are most likely to lead to a termination of the particular contract and may lead to prosecution.

**3.3** The Anti-Fraud, Bribery & Corruption Policy Statement and Strategy are commended to the OLSH Overseas Aid Partner organisations and to schools' governing bodies, with the expectation that they will be applied either wholly or as the basis for their own local version.

### **4 Culture and Stance Against Fraud & Corruption**

**4.1** Responsibility for an anti-fraud culture is the joint duty of all those involved in giving political direction, determining policy and management. The strategy should be directed against fraud and corruption whether it is attempted against OLSH Overseas Aid Inc. from outside or from within its own workforce.

**4.2** OLSH Overseas Aid expects that Members and officers at all levels will lead by example in ensuring adherence to legal requirements, contracts

procedure rules, financial procedure rules, codes of conduct and best (professional) practice.

**4.3** As part of this culture, OLSH Overseas Aid Inc. will provide clear routes by which concerns can be raised by both Members and officers, and those outside who are providing, using or paying for public services.

**4.4** Senior Management is expected to deal swiftly and firmly with those who defraud OLSH Overseas Aid or who are corrupt. OLSH Overseas Aid Inc., including Members, senior management and officers, will be robust in dealing with financial malpractice.

## **5 Raising Concerns**

**5.1** Although this document specifically refers to fraud and corruption, it equally applies to any forms of malpractice that can reduce public confidence in OLSH Overseas Aid Inc. and its services, and may also include acts committed outside of official duties but which impact upon OLSH Overseas Aid's trust in the individual concerned. Examples may include, the criminal acts of theft of "property", which includes all assets and cash; false accounting; obtaining by deception; pecuniary advantage by deception; computer abuse and computer crime. Also, it includes bribery and corruption. Officers and Members can be exposed to a number of "pressures", to act in a particular way in a particular case; this may involve "favouritism" regarding the access to all kinds of services and benefits (e.g. grants, awards, etc.).

**5.2** Members and officers are an important element in OLSH Overseas Aid's stance on fraud, bribery and corruption, and they are positively encouraged and expected to raise any concerns that they may have on these issues where they are associated with OLSH Overseas Aid's activity.

**5.3** Officers should normally raise concerns through their immediate manager, however it is recognised that they may feel inhibited in certain circumstances. In this case, officers and members should contact either the President or vice President.

## **6 Action OLSH Overseas Aid Will Take**

**6.1** All concerns will be treated in confidence and will be investigated promptly and fully in a professional manner. It should be noted that an allegation does not mean the individual person or company is guilty of any wrong-doing, and so they will not be treated as such until the case is proven.

**6.2** If fraud, bribery or corruption has taken place OLSH Overseas Aid will, in appropriate cases

- prosecute the individual(s) or refer the case to the police
- take appropriate disciplinary action where it involves an employee and this may lead to dismissal
- pursue recovery for any financial loss
- where appropriate the results of any action taken, including prosecutions will be reported in the media.

**6.3** There is, of course, a need to ensure that the investigation process is not misused, therefore, any internal abuse, such as raising malicious or vexatious allegations, may be dealt with as a disciplinary matter.

## **7 Anti-Fraud & Corruption Strategy**

**7.1** This Policy Statement also forms an important part of the Anti-Fraud, Bribery & Corruption Strategy by setting out the tone, culture and expectations of OLSH Overseas Aid Inc.

**7.2** The Strategy is concerned with both operational activity to detect and investigate fraud, bribery and corruption and also pro-active actions to deter and prevent fraud and corruption through the development of an anti-fraud and corruption culture.

## **8 The Responsible Officer**

**8.1** The President is responsible for ensuring that OLSH Overseas Aid has control systems and measures in place "to enable the prevention and detection of inaccuracies and fraud, and the ability to reconstitute any lost records". An Anti-Fraud, Bribery & Corruption Policy Statement and Strategy helps towards discharging part of this responsibility.

**8.2** The President is responsible for maintaining an adequate and effective system of internal audit of OLSH Overseas Aid's accounting records and its systems of internal control in accordance with proper practices in relation to internal control.

**8.3** Accordingly, the President will:-

- take overall responsibility for the maintenance and operation of this Policy;
- promote awareness of the principles and practices it contains;
- maintain records of financial malpractice, including concerns and allegations received, matters arising from audits, investigations and evidence and the outcomes;

- report as necessary to the members of OLSH Overseas Aid Inc.