

Division:	Operations	Ref. No.	EXA-RGH-010
Department:	RACS Global Health		
Title:	Fraud and Corruption Prevention Policy		

1. PURPOSE

The Royal Australasian College of Surgeons (RACS) Global Health is involved in a wide range of initiatives to deliver primary, secondary and tertiary health services and develop medical capacity in the Asia-Pacific region. Many of the countries in which Global Health activities take place are difficult environments where poverty and disadvantage are widespread. Governance arrangements can be underdeveloped and attitudes towards fraud and corruption, transparency and accountability may be less developed than in Australia and New Zealand. Given these contextual factors, the delivery of aid and development programs and projects in these environments can face an increased risk of fraud or corruption.

RACS endorses the Department of Foreign Affairs and Trade's (DFAT) Fraud Strategy Statement and works towards all other donor fraud prevention requirements. RACS has a zero tolerance approach to fraud and corruption.

This policy provides a framework for managing and reducing the risks of fraud and corruption in the context of the RACS Global Health Program (including the International Scholarships Program).

2. SCOPE

The prevention and awareness of fraud and corruption is the responsibility of all **people** who contribute to RACS Global Health activities, including:

- Council Members;
- staff;
- volunteers;
- consultants;
- program partners; and
- suppliers.

3. DEFINITIONS

Fraud: Dishonestly obtaining a benefit, or causing a loss, by deception or other means. "Benefit" refers to both tangible items, such as money or objects, and intangible benefits including power, status or information.

Corruption: the offering, giving, soliciting, or acceptance of an inducement or reward that may improperly influence the action of a person or entity. Examples of corruption include bribery, conspiracy, extortion.

4. GUIDING PRINCIPLES

The following principles guide the implementation of this policy:

- (a) RACS Global Health maintains a 'zero tolerance' attitude towards fraud and corruption. Fraud and corruption, regardless of who commits the act and who it is committed against, will constitute misconduct and may be grounds for dismissal, or in the case of supplier or partner relationships, the termination of funding agreements;
- (b) a proactive risk management approach to the assessment, prevention, detection and investigation of suspected fraudulent and corrupt activity is incorporated into business processes, management practices, internal controls and related activities;
- (c) all personnel, contractors and partners of RACS Global Health, whether paid or voluntary, are responsible and accountable to RACS Global Health and to donors to

Approved By:	Chief Operating Officer	Original Issue:	June 2013
Document Owner:	Head of Global Health	Version:	3
		Approval Date:	June 2020
		Review Date:	June 2023

Division:	Operations	Ref. No.	EXA-RGH-010
Department:	RACS Global Health		
Title:	Fraud and Corruption Prevention Policy		

actively prevent and report any fraud within Global Health activities as part of their normal responsibilities;

- (d) all employees, volunteers and Council members have a duty to report concerns they have, or information provided to them, about the possible fraudulent or corrupt activity of any employee, Council member, contractor or consultant, supplier, partner organisation or any other party with an association with RACS Global Health. Reports must be made in good faith and be as thorough as possible. False or malicious allegations or failure to report may result in disciplinary action being taken. All reports should be made to the Head of Global Health and COO at racs.globalhealth@surgeons.org who will advise the CEO;
- (e) the CEO and Global Health Manager are responsible for ensuring incidents are appropriately investigated and appropriate action is taken where preliminary inquiries suggest that there appear to be substance in the allegations. Investigations will be undertaken in a professional and competent manner depending on the nature, size and complexity of the matter. Relevant sanctions may include termination, resignation of agreement or employment, administrative sanctions and/or referral to law enforcement. In the case of referral to external authorities, and reporting to a donor, the final decision will be made by the CEO;
- (f) if alleged fraud or corruption is identified and relates to donor funds, it must be reported to the donor within the relevant timeframes. All suspected or detected frauds related to funding by the Department of Foreign Affairs and Trade (DFAT) are required to be reported to within 5 days of becoming aware of the allegation;
- (g) fraud and corruption risks will be considered as part of RACS Global Health risk management process as outlined in the Risk Management Policy and procedures and incorporated into partner due diligence assessments;
- (h) RACS Global Health is committed to ensuring all relevant personnel are adequately trained on a regular basis on fraud and corruption, and will support partner organisations in the development of their own capacity and processes on fraud and corruption awareness; and
- (i) the detailed procedures for enacting this policy are documented and maintained in the RACS Global Health Finance Manual

5. ASSOCIATED DOCUMENTS

Risk Management Policy

Risk Management Procedures

Finance Manual

Program Manual

Volunteer Manual

Approver International Engagement Committee
Authoriser Council

Approved By:	Chief Operating Officer	Original Issue:	June 2013
Document Owner:	Head of Global Health	Version:	3
		Approval Date:	June 2020
		Review Date:	June 2023