

TITLE	Cabrini Outreach Financial Wrongdoing Policy
TARGET AUDIENCE	All Cabrini Outreach Personnel, Associates, Volunteers and Partners
SCOPE	Cabrini Outreach International Programs and Partnerships

PURPOSE

The purpose of this document is to detail Cabrini Outreach’s commitment to guard against financial wrongdoing

We recognise that fraud, corruption and bribery are sensitive issues in the international development context. We seek to continuously understand what comprises corruption, fraud and bribery, recognise its forms and scale, and be aware of the conditions that lead to it. We believe an effective Fraud Corruption and Control Plan is essential to achieve both operational efficiency and accountability to our stakeholders.

Terrorist acts and violent extremism have no place in any country and we note the responsibility of each country to protect and safeguard its citizens and borders, including through the use of sanctions. This policy commits Cabrini Outreach to strictly adhere to practices and procedures that minimise the risk to its programmes or activities that could in any way provide support to individuals and organisations associated with terrorist acts or violent extremism.

We seek to implement processes that are clear and easy to use and ensure learnings from management, documentation and analysis are able to be used to strengthen our policies, guidelines and procedures and those of our partners.

DEFINITIONS

Financial Wrongdoing	Behaviour that is illegal or immoral with regards to financial transactions. This includes bribery, corruption, fraud, money-laundering, financing terrorist acts and violent extremism, and violation of sanctions imposed by the Australian government
Bribery	The offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards or other advantages
Corruption	The abuse of entrusted power for private gain
Fraud	Dishonestly obtaining a benefit, or causing a loss, by deception or other means
Money Laundering	The process of concealing the origin, ownership or destination of illegally or dishonestly obtained money and hiding it within legitimate economic activities to make them appear legal
Financing Terrorist Acts and Violent Extremism	Intentionally providing or collecting funds and being reckless as to whether those funds would be used to facilitate or engage in a terrorist act

POLICY

Cabrini Outreach commits to conduct its business at all times in a manner that is ethical, lawful, honest, proper and safe.

Cabrini Outreach staff must conduct themselves in a manner consistent with the ethical principles and values of Cabrini Australia Limited and in compliance with the Cabrini Outreach Code of Conduct. Financial wrongdoing, including for the benefit of an individual or Cabrini Outreach, is expressly forbidden.

Cabrini Outreach's partners are expected to adhere to our policies with regard to financial wrongdoing and, through our partnership, build capacity to manage and mitigate the risks they face.

We adopt a proactive and transparent approach to dealing with all forms of financial wrongdoing to mitigate the potential risks to our reputation and impact on the communities with whom we work.

The Cabrini wide Fraud and Corruption Control plan must be applied for all Cabrini Outreach international operations including those conducted by Cabrini Outreach and by partner organisations.

Assessment and mitigation of risks of financing terrorist acts and violent extremism must be undertaken as per the Assessing and Mitigating Risks of Financing Terrorist Acts or Violent Extremism Protocol.

All cases of suspected financial wrongdoing, including fraud, corruption, bribery and/or financing terrorist activity or violent extremism will be investigated and dealt with as deemed appropriate.

EVALUATION

This document will be reviewed annually for content and changes to processes.

REFERENCES and ASSOCIATED DOCUMENTS

Policies and Procedures

Cabrini Fraud and Corruption Plan

Cabrini Assessing and Mitigating Risks of Financing Terrorist Acts or Violent Extremism Protocol

Cabrini Risk Management Framework

Cabrini Outreach Risk Profile

Cabrini Outreach International Development, Quality Management and Governance Framework

Cabrini Outreach Planning, Monitoring, Evaluation and Learning (PMEL) Framework

Executive Sponsor	Group Director Mission & Cabrini Outreach	
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