**External Conduct Standard 3: Anti-fraud and anti-corruption policy**

**1. Purpose**

The purpose of this policy is to ensure **Project Juan’s** operations outside Australia are managed in a way that is solvent, minimal to any risks to our assets including risk of resources being stolen or misused for illicit or illegal purposes. This policy purpose also ensures **Project Juan** is operates in a way consistent with the purpose and nature as a not-for-profit.

**2. Scope**

This policy applies to the board members of **Project Juan** and to all volunteers, engaged third parties and all people who engage in any activities in conjunction with Project Juan.

**3. Definition of fraud, corruption, and bribery**

**Fraud** occurs when someone acts in a dishonest or deceptive way to gain a benefit, or so that someone else experiences a loss. Fraud can occur when making decisions, handling information, managing, and using funds and managing property and other assets.  
**Corruption** refers to dishonest or illegal behaviour for private gain, especially by people with power or influence. Some charities may operate in countries or regions with a high degree of corruption.  
**Bribery** occurs when someone offers money or something of value to a public official to persuade them to do something in their official duties that they would not otherwise do for an advantage

**4. Roles & Responsibilities**

Everyone in **Project Juan** is responsible for fraud control and corruption prevention. Accordingly, every person must report every suspected incident immediately.

The board at **Project Juan** will set the ethical principles of honesty, transparency and use faith based foundations to create an anti-fraudulent and anti-corrupt culture.

The culture will be set from the top from the Director and Board executives to implement a culture of high ethics and integrity.

**5. Policy & Procedures**

These policy & procedures has been developed to address the External Conduct Standard 3: Anti-fraud & anti-corruption standards of **Project Juan**

**Project Juan** will ensure the following considerations in managing circumstances and the associated risks of fraud and other financial impropriety associated with its overseas activities.

* The size and the number of staff and volunteers
* The effectiveness of policies and procedures appropriate to the activities undertaken
* The nature, scale and complexity of overseas activities or funding
* The level of knowledge and experience in managing projects or activities
* The location of the activities, and actual or perceived corruption levels in those regions
* The need for permissions, licenses or other approvals from overseas government bodies
* Work with third parties, particularly arrangements for third party payments
* How conflict of interest is identified and managed
* Issues with previous overseas activities

**Project Juan** will identify and assess the risks of fraud or other financial impropriety it faces when carrying out its work overseas and develop a plan to manage these risks. These plans will be developed and documented and discussed in team meetings.

**Project Juan** will:

* Have clear adequate controls for proper and ethical financial management and ensure volunteers and others that work with the Project Juan are familiar with them.
* Establish thorough and appropriate recruitment procedures for volunteers
* Have staff (coordinators) who are trusted and experienced in the handling of fundraising, managing money and/or financial reporting
* Keep detailed financial records and check financial statements for any signs of financial wrongdoing
* Have a way for staff, volunteers and others that work with Project Juan to report suspected wrongdoing without fear, recrimination, or disadvantage
* Implement a conflicts of interest policy, and keep a conflicts of interest register
* Address any conflicts of interest when selecting third parties.
* Thoroughly check a third party's reputation and experience before choosing to work with them.
* Make ethical conduct and good financial oversight a key criterion when selecting partners
* Ensure there is a clear written agreement with each third party that sets out the functions and responsibilities of the people involved
* Properly monitors activities

**Project Juan** aims that thesepolicies and procedures will reduce the chances of something going wrong and although it will not entirely eliminate the risk we have the plan in place to help manage the consequences of something going wrong and to prevent the incident from re-occurring.

**Contacts**

For questions about this policy, contact the board or **Alden Viado** by email on project\_juan@zoho.com