

1 Introduction

The Leprosy Mission Australia (TLMA) is committed to taking all relevant measures to prevent, detect and respond to fraud and corruption and ensure the appropriate use of funds across all its areas of activity.

This policy establishes TLMA's zero-tolerance approach to fraud, bribery, and corruption. It outlines our commitment to:

- Prevent, detect, and respond to fraud and corruption;
- Maintain integrity across all operations both locally and internationally;
- Comply with following legislations and regulations:
 - DFAT's Fraud and Corruption Control Framework 2025,
 - Commonwealth Fraud and Corruption Control Framework 2024,
 - National Anti-Corruption Commission Act 2022 (NACC Act)
 - Australian Government Investigations Standards (AGIS), and the Commonwealth Protective Security Policy Framework (PSPF);
 - DFAT's Toolkit for Service Providers
- Promote a culture of integrity, accountability, transparency, and ethical behaviour.

For the purpose of implementing this policy, TLMA focuses on the following principles:

- A. Training / awareness
- B. Due diligence / assessment
- C. Development of strategies and controls for ongoing compliance and improvement

2 Definitions

TLMA adopts the definitions of fraud and corruption as set out in the *Commonwealth Fraud and Corruption Control Framework*, and the *National Anti-Corruption Commission Act 2022 (NACC Act)* respectively, as amended from time to time. Regarding foreign bribery, TLMA adopts the meaning as derived in the *Criminal Code Act 1995 (Criminal Code)* as amended from time to time.

Fraud

Fraud is defined as 'dishonestly obtaining (including attempting to obtain) a gain or benefit, or causing a loss or risk of loss, by deception or other means.' This definition is based on the dishonesty offences under the Criminal Code (chapter 7). However, the conduct does not need to represent a breach of criminal law.

A benefit or loss is not restricted to a material benefit or loss and may be tangible or intangible. A benefit may also be obtained by a third party.

Fraud may include (but is not limited to):

- theft of funds or property
- accounting fraud (for example, false invoices, misappropriation)
- misuse of resources of TLMA, our partners or governments
- unlawful use of, or unlawful obtaining of, property, equipment, material, or services
- causing a loss or avoiding and/or creating a liability

- providing false or misleading information, or failing to provide information when there is an obligation to do so
- misuse of assets, equipment, or facilities
- cartel conduct
- making, or using, false, forged, or falsified documents; wrongfully using information or
- intellectual property of TLMA, our partners or governments
- misuse of information and business records.

Fraud can include corrupt conduct where the conduct results in a party obtaining a benefit from, or causing a loss to TLMA, our partners or governments.

Corruption

Corruption is an abuse of entrusted power or position for improper personal or business advantage. It is defined broadly consistently with the NACC Act. It includes any conduct that does or could compromise the integrity, accountability, or probity of public administration. Generally, it can include any dishonest activity in which a person acts against the interest of TLMA by abusing a position of trust in order to achieve some personal gain or advantage. It can often involve a public servant, politician or corporation demanding or misusing money in exchange for services or deals. It may also relate to bribery of foreign officials to help facilitate project implementation.

Pursuant to the NACC Act, this includes:

- any conduct of any person that adversely affects, or that could adversely affect, either directly or indirectly:
 - the honest or impartial exercise of any person's powers , or
 - the honest or impartial performance of any person's functions or duties
- any conduct of a person that constitutes or involves a breach of public trust
- any conduct of a person that constitutes, involves, or is engaged in for the purpose of abuse of the person's office
- any conduct of a person that constitutes or involves the misuse of information or documents acquired in the person's office.

A person can include:

- a staff member or Board member of TLMA or our partners
- an individual who is employed or engaged in assisting TLMA or our partners, or
- a contracted service provider.

Fraud and corruption often overlap as both involve dishonest or illegal behaviour to gain an unfair advantage or benefit, or cause loss. However, fraud involves deception to make a gain or cause a loss (for example, provision of false information to obtain a payment) whereas corruption involves the abuse or misuse of power or position (for example, soliciting bribes, or nepotism). Therefore, corrupt conduct can include breaches of the code of conduct, as well as elements of both fraud and corruption.

3 Scope of Policy

This policy applies to all TLMA staff members, TLMA Board members, volunteers, consultants, contractors, and implementing partners. Every member of staff and associated person acting for, or on behalf of, TLMA is responsible for maintaining the highest standards of business conduct and are expected to be aware of this policy and understand the fraud and corruption risk and consequences in matters related to their areas of work.

Roles and responsibilities are set out below:

3.1 The Board

The TLMA Board are responsible for:

- creating a culture of Zero Tolerance toward fraud and corruption.
- providing governance guidance for TLMA in relation to fraud and corruption.
- holding CEO and Senior Leadership Team accountable to this Policy

3.2 Senior Management

Senior management are responsible for:

- ensuring this Policy is upheld, regularly updated, and will inform the Board of any concerns relating to fraud and corruption that may present risk to TLMA, its personnel, beneficiaries, partners, reputation, operations or other activities.
- ensuring that appropriate risk assessment and mitigation controls are put in place and regularly reviewed, guided by TLMA's fraud and corruption control strategy/framework.
- Providing regular training on positive risk culture, awareness and controls relating to fraud and corruption
- Reports all suspicions and/or incidents of fraud to DFAT and law enforcement agencies ensuring procedures, practices, plans and operations align with this Policy.
- ensuring that all entities and relevant personnel are trained to be aware of, and understand, this Policy and their responsibilities under it.
- ensure that there are appropriate and accessible reporting pathways for people to raise concerns about potential fraud and corruption
- ensuring that any incident of fraud and corruption is investigated and resolved appropriately.

3.3 Staff / Partners / Volunteers / Contractors

Staff and partners are responsible for:

- implementing and ensuring the preventative controls
- comply with procedures that align with this policy
- reporting any suspicions of fraud and corruption immediately without any fear of retaliation and understand that failure to do will result in disciplinary actions

TLMA has a zero-tolerance policy for retaliation against individuals who report wrongdoing.

4 Commitment and Obligations

As an international development agency, TLMA operates in diverse countries with varying governance systems, levels of accountability, and transparency. This context requires us to engage with risk—including the risks of fraud and corruption—in a thoughtful and proportionate manner. It is essential that we understand these risks, assess their potential impact on our objectives, and take transparent, accountable actions to manage them effectively.

TLMA is committed to fostering a positive risk culture—one that promotes collaboration, encourages critical thinking, and values independent perspectives. This culture is shaped by the attitudes and behaviours of both our leaders and staff.

We expect our staff to develop strong leadership in risk management by being proactive in identifying, managing, and responding to risks. Our Board and Senior Leadership are expected to model this approach and promote it throughout their teams.

Fraud and corruption risks should be properly understood, documented, and managed. Where appropriate, fraud risk issues must be escalated to ensure effective oversight and response.

TLMA is committed to taking all reasonable steps to prevent, detect, and respond to fraud and corruption across its operations.

- Providing appropriate and periodic training to all relevant stakeholders.
- Conducting annual assessment to identify and understand fraud and corruption risks, while promoting awareness of these risks across the organisation.
- Conducting a project specific fraud and corruption risk assessment and producing a fraud and corruption control strategy within one month of commencement of an arrangement with DFAT.
- Designing and implementing control plans that address risks in finance, procurement, human resources, and partnerships, with clearly assigned responsibilities.
- Continuously monitoring and evaluating the effectiveness of fraud and corruption controls.
- Establishing robust governance frameworks to oversee and manage related risks.
- Fostering a culture of integrity through regular education and training for employees.
- Ensuring all staff and delivery partners adhere to relevant codes of conduct.
- Maintaining efficient systems and processes to detect and prevent fraudulent or corrupt activities.
- Investigating all suspected allegations of fraud and corruption, where appropriate. This is outlined in the Investigation and Reporting Procedure
- Referring matters to the appropriate authorities when required. Where possible, efforts will be made to recover any losses incurred.
- Develop a plan or strategy to address any issue or concern arising from any report or investigation.

4.1 Reporting obligations for TLMA staff and volunteers

TLMA staff (including volunteers) are required to participate in training sessions or review this Policy and other materials as requested by TLMA.

TLMA staff (including volunteers) are required to immediately advise either the SafeCall, Designated Safeguarding Officer (DSO), Designated Safeguarding Lead (DSL), Deputy DSL, CEO or Board Safeguarding Lead of any form of fraud and corruption including bribery, fraud, money-laundering, breach of sanctions or terrorism financing occurring in our operations and programs and a full investigation will be conducted by the relevant leads and reported back to TLMA Board and/or TLMA Governance and Risk Committee.

It is important to highlight that fraud and corruption is a serious form of misconduct and if substantiated against a TLMA worker, will be dealt with in accordance with TLMA's Disciplinary Procedure (refer to TLMA Staff Manual).

5 TLMA Governance and Reporting Responsibilities

TLMA staff (including volunteers) will report to the Board and relevant Committees to provide assurance on the appropriateness of controls to prevent, detect, and respond to fraud and corruption in the form and process determined by the Senior Management.

In line with ACNC Act, charities are required to report fraud and corruption breaches to relevant authorities as soon as practicable, no later than 28 days after the charity has knowledge of the breach and where it involves Partner receiving ANCP funding, to DFAT within 5 days of being notified of suspected fraud and corruption.

Anyone found to have breached this Policy, including failing to report fraud, bribery or anti-corruption concerns or co-operate with investigations, will face appropriate action from TLMA to the extent of our authority. The consequences may amount to one or more of the following (this is a non-exhaustive list):

- a) Disciplinary action, which may amount to dismissal of staff
- b) Termination of engagement for Board members, volunteers, and other representatives.
- c) Termination of contract for consultants/contractors

- d) Suspension/withdrawal of funding/support and ending the relationship with TLMA for Members, Partners, and Suppliers.
- e) The matter being reported to the relevant law enforcement and other agencies where appropriate.

6 Contacts

Contacts to whom a complaint can be made can be found on the [Safeguarding](#) page on our website.

7 Key Legislation and Standards

- Australian Charities and Not-for-profits Commission Act 2012
- Australian Charities and Not for profits Commission Amendment (2018 Measures No. 2) Regulations 2018
- Criminal Code Act 1995
- Criminal Code Amendment (Theft, Fraud, Bribery and Related Offences) Act 2000
- ACNC Governance Standards and External Conduct Standards
- ACFID Code of Conduct
- DFAT Fraud Control Toolkit
- DFAT's Fraud and Corruption Control Framework 2025,
- Commonwealth Fraud and Corruption Control Framework 2024,
- National Anti-Corruption Commission Act 2022 (NACC Act)
- Australian Government Investigations Standards (AGIS), and the Commonwealth Protective Security Policy Framework (PSPF);

8 Related Documents

TLMA:

- Child and Vulnerable Adults Protection Policy and Procedure
- Code of Acceptance and Refusal of Donations Policy
- Counter-Terrorism Policy
- Currency Exchange Policy
- Finance and Administration Manual
- Partnership and Participation Policy
- Risk Management Policy
- Safeguarding Policy and Procedure
- Staff Manual
- Disciplinary Guidelines
- Whistleblowing Policy and Procedure

TLM's wider Safeguarding and protection measures are implemented through the following policies and procedures:

- Safeguarding Policy
- Safety and Security Policy
- Whistleblowing Policy

9 Policy Review

This Policy will be reviewed in 2 years, or as required.

9.1 Revision History

Version	Date	Author	Summary
6.0	17 October 2023	Nerida Collard	New draft created for next revision
6.1	28 July 2025	Senior Leadership Team	Reviewed and minor amendments made
6.2	12 July 2025	FAIC	Reviewed and minor amendments made
6.3	10 Oct 2025	HF, GT	Amended to include legal and governing authorities framework
6.4	23 January 2026	Jae Yang, Principal	Legal review by Charitas Law
6.5	27 January 2026	Andrew Newmarch	Slight amendments to fit with DFAT terminology
6.6	4 February 2026	Sophia Chen	Review and clarifications
6.7	16 February 2026	Jae Yang	Review and clarification

Version	Date	Approved by
1.0	4 May 2015	TLMA Board
2.3	30 April 2018	TLMA Board
3.4	4 March 2019	TLMA Board
4.3	28 June 2021	TLMA Board
5.2	25 September 2023	TLMA Board
6.7	28 February 2026	TLMA Board