
GOVERNANCE POLICY

Fraud Prevention and Whistleblower Policy

Preventing wrongdoing, and protecting the people who speak up

Version 1.0 - July 2026

Policy owner	Board of Directors, THRIV3 (Indigenous Corporation)
Responsible officer	Chief Executive Officer
Applies to	Directors, members, the CEO, employees, volunteers, contractors, students on placement, agency workers and suppliers of THRIV3 (together, THRIV3 People)
Effective date	July 2026
Next review	July 2027 (or earlier if legislation or funding conditions change)
Related documents	Code of Conduct; Expenditure and Procurement Policy; Corporate Expenses and Credit Cards Policy; Conflict of Interest Policy; Grievance and Complaints Policy; Whistleblower Disclosure (Form F21)

1. Purpose and Scope

THRIV3 (Indigenous Corporation) holds every dollar and every trust placed in us on behalf of community. Fraud, corruption and dishonest conduct betray that trust, put our funding at risk and harm the people we serve. This policy sets out how THRIV3 prevents, detects and responds to fraud and corruption, and how it protects people who speak up about wrongdoing.

It applies to all THRIV3 People and to our suppliers and partners. It works together with the Code of Conduct, the Expenditure and Procurement Policy, the Corporate Expenses and Credit Cards Policy and the Conflict of Interest Policy.

2. Our Commitment

THRIV3 has **zero tolerance** for fraud, corruption, theft and dishonest conduct by anyone connected with the corporation. We build strong controls, act quickly on concerns, support those who report in good faith, and refer criminal conduct to the police and to our funders and regulators where required.

3. What Fraud and Corruption Mean

Fraud is dishonestly obtaining a benefit, or causing a loss, by deception or other unfair means. Corruption is the misuse of position or power for private gain. Examples include:

- falsifying timesheets, invoices, receipts, claims or records
- using THRIV3 funds, cards, vehicles, equipment or property for private benefit
- theft of cash, assets or stock, or skimming program or kiosk takings
- creating false suppliers, duplicate payments, or diverting payments to personal accounts
- secret commissions, kickbacks, bid-rigging or accepting a benefit to influence a decision
- concealing a conflict of interest to direct work or funds to a related party
- misusing grant funds for purposes the grant agreement does not allow, or giving false information in an acquittal.

4. Preventing Fraud

THRIV3 designs its systems so that no one person controls a transaction from start to finish. Our key controls are:

- **Separation of duties:** the person who requests, the person who approves, and the person who pays are different people.
- **Delegations and dual authorisation:** spending is committed only within written delegations, and bank payments require two authorised signatories, under the Expenditure and Procurement Policy.
- **Supplier verification:** new suppliers and any change to supplier bank details are verified independently by phone to a known contact before payment.
- **Reconciliations:** bank, card and account reconciliations are performed weekly and reviewed by someone independent of the person who prepared them.
- **Screening:** people in roles involving funds, assets or vulnerable people are screened under the Recruitment, Screening and Onboarding Policy.
- **Asset and cash controls:** cards, keys, cash floats and assets are issued to named people, secured, and acquitted with receipts.
- **Culture:** leaders model honesty, conflicts of interest are declared and managed, and people are encouraged to ask questions and raise concerns early.

5. Detecting and Reporting Fraud

Everyone at THRIV3 has a duty to report fraud or corruption they become aware of or reasonably suspect. You do not need proof, and you will not be penalised for a report made honestly, even if it turns out to be mistaken. Report to your manager, the CEO, the Board Chair, or the nominated Whistleblower Protection Officer. Where a concern involves the CEO, report to the Board Chair. Suspected fraud is also handled as a disclosable matter under the whistleblower protections below.

6. Who Can Make a Whistleblower Disclosure

THRIV3 extends whistleblower protection to a broad group, consistent with the whistleblower protections in the Corporations (Aboriginal and Torres Strait Islander) Act 2006 (Cth) (CATSI Act) and better-practice standards. Eligible whistleblowers include:

- current and former Directors, members, the CEO, employees and officers
- current and former volunteers, contractors, consultants, students on placement and agency workers
- suppliers and their employees
- relatives, dependants and family members of any of the above.

7. What Can Be Disclosed

A disclosable matter is information you reasonably suspect concerns misconduct, or an improper state of affairs, in relation to THRIV3. It includes fraud, corruption, theft, bribery, dishonesty, a breach of the law, a danger to the public or to a person, misuse of grant or public funds, and conduct that represents a danger or detriment. Personal work-related grievances (for example a dispute about your own employment) are dealt with under the Grievance and Complaints Policy, not this policy, unless they involve detriment for making a disclosure.

8. How and to Whom to Disclose

You may make a disclosure openly or anonymously, and you may remain anonymous throughout. Disclosures may be made to:

- the Whistleblower Protection Officer or your manager who is nominated by the Board (the first point of contact)
- the CEO, or the Board Chair (or another Director where the Chair is involved)
- the Whistleblower Disclosure Form (Form F21), or verbally to any of the people above
- externally, at any time, to the Office of the Registrar of Indigenous Corporations (ORIC), the Australian Charities and Not-for-profits Commission (ACNC), the National Indigenous Australians Agency (NIAA) where grant funds are affected, the police or the Australian Federal Police.

9. Protections for People Who Speak Up

THRIV3 protects people who make a disclosure in good faith. Specifically:

- **Confidentiality:** the disclosers identity is kept confidential and is shared only with their consent or where the law allows, and disclosures are handled by as few people as possible.
- **No detriment:** victimisation, dismissal, demotion, harassment or any other detriment for making a disclosure is prohibited and is treated as serious misconduct.
- **Protection from liability:** a person is not subject to civil, criminal or administrative liability merely for making a qualifying disclosure.
- **Support:** the discloser is offered support, including access to the Employee Assistance Program and a support person, and is kept informed as far as confidentiality allows.

10. How THRIV3 Responds to a Disclosure

Every disclosure is assessed promptly. Where investigation is warranted, an impartial investigator (internal or external) gathers the facts, affords procedural fairness to any person the subject of an allegation, and reports findings to the Board or CEO as appropriate. Interim measures may be taken to protect people, funds and evidence. Records are kept securely and separately, and handled under the Privacy and Workplace Surveillance Policy.

11. False or Vexatious Reports

Protections apply to genuine disclosures. Knowingly making a false report, or a report made in bad faith to cause harm, is itself a breach of the Code of Conduct and may lead to disciplinary action. A report that is honestly made but not substantiated is not a false report and attracts full protection.

12. Reporting to Regulators and Funders

Where a matter requires it, THRIV3 reports to ORIC under the CATSI Act, to the NIAA or other funder where grant funds are affected and the funding agreement requires, to the ACNC, and to the police where criminal conduct may be involved. THRIV3 recovers misappropriated funds where it can.

13. Responsibilities and Review

The Board owns this policy, appoints the Whistleblower Protection Officer, and oversees serious matters. The CEO maintains fraud controls, ensures disclosures are handled fairly and without reprisal, and reviews this policy annually. Every THRIV3 person works honestly, follows the controls, and speaks up.

Board adoption

This policy was adopted by the Board of Directors of THRIV3 (Indigenous Corporation) and takes effect from the date recorded below. It will be reviewed at least every 12 months, and earlier if legislation, ORIC or ACNC requirements, or funding conditions change.

Adopted On: