



Partner Housing Australasia (Building) Incorporated  
 ABN 88 722 057 429 CFN: 15429  
 Web: [www.partnerhousing.org](http://www.partnerhousing.org)  
 Pro-bono professional services and funding for South Pacific  
 village infrastructure, housing, water, sanitation and training.



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Partner Housing is a signatory to the ACFID Code of Conduct, which is a voluntary, self-regulatory sector code of good practice. As a signatory we are committed and fully adhere to the ACFID Code of Conduct, conducting our work with transparency, accountability and integrity.

## Partner Financial Risk Management Policies and Procedures



**Declaration** – These policies and procedures have been approved by the Partner Housing Australasia (Building) Incorporated General Meeting of 3 April 2023. They set out the means of complying with the “Constitution & Code of Conduct”, and the requirements of the Australian Department of Foreign Affairs and Trade (DFAT) and the Australian Council for International Development (ACFID).

**Signed**

Rod Johnston, President, Partner Housing Australasia (Building) Incorporated

**Adoption of Document Revisions**

Reference	Revision	Date of Adoption	Principal Amendments
P23040354	1	3 April 2023	Revision to align with Vision, Mission, Values & DFAT requirements

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## Vision

Partner Housing Australasia is an entirely voluntary organisation, which aims to transform the lives of people living in Asia-Pacific villages by improving the cyclone, earthquake and tsunami resistance of their houses, clinics, schools, and community buildings; and by providing clean water supplies and hygienic sanitation.

## Commitment

Consistent with the vision, Partner Housing Australasia is committed to sound fiduciary and financial risk management of the Partner Organisations and their programs.

## Code of Conduct

Partner Housing Australasia is a signatory to the ACFID Code of Conduct, which is a voluntary, self-regulatory sector code of good practice. As a signatory, we are committed and fully adhere to the ACFID Code of Conduct, conducting our work with transparency, accountability, and integrity. The following policies and procedures have been developed to reflect the vision, and to simultaneously ensure consistency with the ACFID Code of Conduct.

## Scope

These Policies and Procedures apply to Partner Housing Australasia, its Partner Organisations, Representatives, and any guests who might accompany these people to the locations where the programs are implemented. The “Policy” expands the organisation’s vision, mission, and values; together with satisfying the DFAT and ACFID requirements, and the “Procedures” set out the means of implementing policy. An associated “Training” document provides additional material and background, and “Compliance and Audit Record” documents provide the relevant records of compliance and verification.

## Definitions

A comprehensive set of definitions is set out in “Constitution & Code of Conduct”. Definitions specific to this policy are set out below.

Partners and Partner Organisations are the organisations with whom the organisation collaborates to deliver services to the Beneficiaries. In more detail, Partner may also mean the individuals, groups of people or “not-for-profit” organisations that collaborate with Partner Housing Australasia to achieve mutually agreed objectives in aid and development activities. For purposes of this document, they include (but are not limited to) Vision for Homes [PNG] and South Ranongga Community Association [SRCA].

Representatives is the term used to describe collectively the Board Directors, Managers, Volunteers, Staff (if so engaged), Contractors and Consultants who administer the programs and projects.

Volunteer means a person who carries out executive, management, administrative, operations, design, project management and/or similar functions (whether executed in Australia or overseas) on a pro bono basis, under the direction of the Chief Executive Officer (on behalf of the Board). A Volunteer may also be a Member or a Director. Partner Housing Australasia is an entirely voluntary organisation. Volunteer does not include “Contractors” or “Consultants”, who provide goods or services on a pro bono or commercial basis, or people who provide minor assistance on a casual and infrequent basis.

Consequence is the outcome of an event affecting objectives. A consequence can be certain or uncertain and can have positive or negative direct or indirect effects on objectives. Consequences can be expressed qualitatively or quantitatively. Any consequence can escalate through cascading and cumulative effects. Consequence is the outcome of an event or situation expressed qualitatively or quantitatively, being loss, injury, disadvantage, or gain.

Event is an occurrence or change of a particular set of circumstances. An event can have one or more occurrences, and can have several causes and several consequences. An event can also be something that is expected which does not happen, or something that is not expected which does happen. An event can be a risk source.

Control is a measure that maintains and/or modifies risk. Controls include, but are not limited to, any process, policy, device, practice, or other conditions and/or actions which maintain and/or modify risk. Controls may not always exert the intended or assumed modifying effect.

Likelihood is chance of something happening. In risk management terminology, the word “likelihood” is used to refer to the chance of something happening, whether defined, measured or determined objectively or subjectively, qualitatively or quantitatively, and described using general terms or mathematically (such as a probability or a frequency over a given time period). The English term “likelihood” does not have a direct equivalent in some languages; instead, the equivalent of the term “probability” is often used. However, in English, “probability” is often narrowly interpreted as a mathematical term. Therefore, in risk management terminology, “likelihood” is used with the intent that it should have the same broad interpretation as the term “probability” has in many languages other than English. For purposes of this policy, “Likelihood” is a qualitative description of probability and frequency. It is a means of ranking the probabilities of occurrence, but is not an indication of the actual probability of failure. For example, 2 out of 10 is not a 20% probability of occurrence. Rather, it is simply a statement the 2 out of 10 is twice as likely than 1 out of 10.

Risk is the effect of uncertainty on objectives. An effect is a deviation from the expected. It can be positive, negative or both, and can address, create or result in opportunities and threats. Objectives can have different aspects and categories, and can be applied at different levels. Risk is usually expressed in terms of risk sources, potential events, their consequences and their likelihood.

Risk Assessment is the process used to determine risk management priorities by evaluating and comparing the level of risk against predetermined standards, target risk levels or other criteria. For purpose of this policy, Risk Assessment is carried out in accordance with the principles set on in AS/NZS 4360 Appendix D, suitably modified to provide meaningful information suited for use in the context of PHA activities. The higher values of “Risk Rating” indicate that priority is given to mitigating these considerations

Risk Analysis is a systematic use of available information to determine how often specified events may occur and the magnitude of their likely consequence. For purposes of this policy, Risk Analysis, and associated terms (including those listed herein) are as defined in ISO 31000 and AS/NZS 4360.

Risk management is the coordinated activities to direct and control an organization with regard to risk.

In particular –

- Activity level risk management deals with managing risk generated as a result of executing programs and projects, and includes consideration of the Code of Conduct issues (including child protection); and
- Organisational level risk management deals with managing risk to the organisation as a whole, generated as a result of all operations, including staff safety and security, safeguarding, incident management, staff integrity, high risk contexts, financial viability, reputation governance, and Code of Conduct issues (including child protection).

Risk source is an element which alone or in combination has the potential to give rise to risk.

Stakeholder is a person or organization that can affect, be affected by, or perceive themselves to be affected by a decision or activity. The term “interested party” can be used as an alternative to “stakeholder”.

Monitoring is the systematic observation over a nominated period of time of the performance of programs, and reporting against predetermined criteria.

Evaluation is the determination of whether the reported performance of programs meets the expectations for the program, as defined by predetermined criteria.

Accountability means the processes through which an organisation makes a commitment to respond to and balance the needs of stakeholders in its decision-making processes and activities, and delivers against the commitment’.

Beneficiaries are the people of the Asia-Pacific villages who benefit from the organisation’s building programs and professional services. In more detail, beneficiaries are the women and men, boys and girls who are participants in, and directly affected by, aid and development activities in the geographical area in which the activity is undertaken. Beneficiaries may also be known as “local people” or “primary stakeholders”.

Civil Society Organisation (CSO) means non-government organisations (NGOs), not-for-profit organisations (NPOs), charities and community-based organisations (CBOs). Can also include religious organisations, trade unions, foundations and any institutions outside of the corporate and government sectors.

Fiduciary risk ... is the risk that funds are not used for the intended purposes; do not achieve value for money; and/or are not properly accounted for. The realisation of fiduciary risk can be due to a variety of factors, including lack of capacity, competency or knowledge; bureaucratic inefficiency; and/or active corruption.

<https://daisi.com.au/fiduciary-assessment-of-implementing-partners/>

Program is the overarching development approach and initiative that set priorities and guide project outcomes, results, and activities. Programs constitute a coherent set of development projects that pursue a single focus, which may be regional, sectoral, or country based.

Project is the practical implementation of an NGO’s overarching development approach or program. Projects are discrete investments in particular countries, contexts and/or sectors, with a specific start and end date and identified funding.

## Policy <sup>1</sup>

Partner Housing Australasia shall carry out all functions necessary to ensure sound fiduciary and financial risk management of the Partner Organisations and their programs.

### *E2.2 ANGO undertakes regular assessment of the financial and risk management systems and capacity of implementing partners (fiduciary assessment) before contracting.*

Partner Housing Australasia shall carry out an annual fiduciary assessment of implementing Partner Organisations, considering the financial and risk management systems, and organisation capacity.

Fiduciary assessments shall consider whether the implementing Partner Organisations have the financial capacity and the management and labour capacity, necessary to complete the next stage of the program, a verifiable reputation for honesty and reliability, government registrations, governance, policies and procedures, and the requisite building skills. The fiduciary assessments shall make clear recommendations regarding the continuation (or otherwise) of the current programs; and should provide the names of persons whose advice has been sought in making the recommendations.

### *E2.3 ANGO regularly receives and reviews project acquittals from implementing partners*

Partner Housing Australasia shall annually receive and review detailed program acquittals from implementing Partner Organisations.

The following requirements apply to donated funding, for which the donor requires financial acquittals to be provided as a condition of the donation.

- a) Annual acquittal reports shall disclose:
  - Funds received from donors;
  - Interest earned on donor project funds and applied to the activity for approved purposes (under a revenue heading of 'interest earned');
  - Actual expenditure by line item (against the agreed budget line items); and
  - Explanations when line items exceed a 10% variation from the agreed budgets.
- b) Acquittals shall be reported on an accrual basis.
- c) Acquittal certifications shall be in a format agreed with the donor
- d) Acquittal certifications shall be signed by the nominated Partner Housing Australasia representative.
- e) Unless agreed otherwise in the contract (or MOU) covering the donation of funds, any unspent funds, interest and exchange rate gains remaining after the provision of the completion report shall be refunded to the donor.
- f) The consolidation of project activity costs and acquittals (within the broader context of the programs) shall be transparent, and shall provide an audit trail.
- g) Partner Housing Australasia tracks funding and expenditure using the Xero accounting package, but also provides more detail using MS Excel workbooks, where appropriate, to show the relevant expenditure by line item.
- h) A budget, used for an acquittal, shall be the most current agreed budget.

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<sup>1</sup> Refer also to Policy No. P23040356 Partner Financial Risk Management Policies & Procedures for consideration of the risks originating from the activities of the implementing Partner Organisations.

- i) Unusual expenditure variances from the agreed budget line items shall be scrutinised and followed up with the implementing Partner Organisation for explanation, before submitting the acquittal or the amalgamated acquittal (including Partner Housing Australasia acquittal expenditure) to the donor.

Note: Donor means an organisation of individual that has donated funds for an agreed purpose of funding development programs. In this document, potential donors may include DFAT.

#### *E2.4 ANGO monitors and responds to the financial management performance of its implementing partners*

Partner Housing Australasia shall closely monitor the financial management practices of implementing Partner Organisation and their financial performance of the programs.

Partner Housing Australasia managers shall communicate regularly with the implementing Partner Organisation managers by email and other methods, as appropriate, to discuss implementation of the project.

Partner Housing Australasia shall use the DANCER Building System MS Excel workbook and the VILLAGE ACQUA MS Excel workbook to prepare, review and approve activity budgets. Recorded project costs (and financial acquittals) shall be reviewed, and compared to the standardised costs in the design workbooks. Significant variations shall be explained, and (if appropriate) the standardised costs shall be amended.

Other performance issues and delays shall be reported and investigated.

Partner Housing Australasia shall prepare Strategic Plans for each program and provide training, which include the building of financial and skills capacities of implementing Partner Organisations.

#### *E2.5 ANGO assesses that implementing partners have practices in place to facilitate the prevention, detection and investigation of fraud*

Partner Housing Australasia shall ensure that implementing Partner Organisations have policies, procedures and practices for the prevention, detection and investigation of fraud. Partner Housing Australasia commitment includes:

- review and approval of the fraud prevention policies of implementing Partner Organisations,
- the provision of fraud prevention training,
- the initiation of discussions to facilitate the prevention,
- assisting Partner Organisation to detect and investigate fraud,
- the review and approval of the Partner Organisations' fraud prevention policies (included in the relevant MOU),
- reviewing the Partner Organisation key controls for the mitigation of fraud; and
- assisting with appropriate fraud investigations, should the need arise.

## **Responsible Personnel**

The person with overall responsibility for implementing this policy is the Chief Executive Officer (CEO), with delegated responsibility to the Regional Managers for program management and the Finance Manager for financial management.

## **Procedures**

### **Review of this Policies and Procedures Document**

This “Policies and Procedures” document shall be reviewed at each Annual General Meeting, as part of the scheduled general policy review.

### **Risk Analysis**

The CEO shall implement the following:

- Ensure that the Partner Organisation Manager visits each current and proposed work site, conducts discussions with the village residents, and determines the factors that are likely to affect the risk resulting from the proposed project. This determination shall be emailed to the Partner Housing Australasia CEO and to the Regional Manager.
- Carry out thorough desk research into the potential risk resulting from the proposed and current projects.
- Based on the determination and desk research and the input from the Partner Organisations, prepare a Risk Analysis, considering both the direct and indirect actions of Partner Housing Australasia and the implementing Partner Organisation.
- Assess and prioritize the risk associated with each program and its component projects, and determine the appropriate mitigation actions (risk treatment).
- Record the Risk Analyses and the mitigation actions in the Strategic Plans appropriate to each program.
- Summarize the Risk Analyses and the mitigation actions in a Risk Register.
- Implement the proposed mitigation actions (risk treatment).
- During regular reviews, consider the effectiveness of the mitigation actions (risk treatment) and report to the Board.

### **Fiduciary Assessment of Partner Organisations**

The CEO or Finance Manager shall –

1. Prepare fiduciary assessments of the implementing Partner Organisations, and the risk that they present to Partner Housing Australasia and donor organisations.
2. Present the fiduciary assessments to the February Board Meeting for consideration and adoption.

The following template shall be used to present the information in an orderly manner.

<b>Fiduciary Assessment of</b>	Input
Date of fiduciary assessment	Input
Program description	Input
Phase 3 - Scaling-up	Input
Does the Partner Organisation have the financial capacity necessary to complete the next stage of the program?	Input
Does the Partner Organisation have the management and labour capacity necessary to complete the next stage of the program?	Input
Does the Partner Organisation have a verifiable reputation for honesty and reliability suitable for the next stage of the program?	Input
Does the Partner Organisation have the government registrations necessary to undertake the next stage of the program?	Input
Does the Partner Organisation have the governance, policies and procedures necessary to undertake the next stage of the program?	Input
Does the Partner Organisation have the building skills necessary to complete the next stage of the program?	Input
What other comments are relevant to this fiduciary assessment?	Input
Who is prepared to vouch for the accuracy of the comments above?	Input



## **Financial Acquittals**

The Finance Manager shall ensure that

- a) Annual acquittal reports are prepared for programs and projects for which Partner Organisations have received funding from Partner Housing Australasia.
- b) Annual acquittal reports disclose:
  - Funds received from donors;
  - Interest earned on donor project funds and applied to the activity for approved purposes (under a revenue heading of 'interest earned');
  - Actual expenditure by line item (against the agreed budget line items); and
  - Explanations when line items exceed a 10% variation from the agreed budgets.
- c) Acquittals reported on an accrual basis.
- d) Acquittal certifications in a format agreed with the donor
- e) Acquittal certifications signed by the nominated Partner Housing Australasia representative.
- f) Unless agreed otherwise in the contract (or MOU) covering the donation of funds, any unspent funds, interest and exchange rate gains remaining after the provision of the completion report are refunded to the donor.
- g) The consolidation of project activity costs and acquittals (within the broader context of the programs) are transparent, provide an audit trail.
- h) Funding and expenditure are reported in the Xero accounting package, and more detail using MS Excel workbooks, to show the relevant expenditure by line item.
- i) A budget, used for an acquittal, is the most current agreed budget.
- j) Unusual expenditure variances from the agreed budget line items shall be scrutinised and followed up with the implementing Partner Organisation for explanation, before submitting the acquittal or the amalgamated acquittal (including Partner Housing Australasia acquittal expenditure) to the donor.

## **Monitoring and Response to Partner Organisation's Financial Management**

The Financial Manager (with assistance by the CEO) shall –

1. Monitor the financial management practices of implementing Partner Organisation and their financial performance of the programs, by receiving and assessing their Annual Profit and Loss reports, Balance Sheets and Financial Acquittals.
2. Prepare Strategic Plans for each program.
3. Brief the Board and prepare budgets, within the context of available funds
4. Receive and analyse financial acquittals, and monitor the performance of programs (and projects).
5. Compare financial performance to the DANCER Building System MS Excel workbook and the VILLAGE AQUA MS Excel workbook to prepare, review and approve activity budgets. Recorded project costs (and financial acquittals) shall be reviewed, and compared to the standardised costs in the design workbooks. Significant variations shall be explained, and (if appropriate) the standardised costs shall be amended.
6. Maintain the Xero accounting software package to record all financial transactions, including those with Partner Organisations.
7. Use the customised MS Excel accounting workbook to prepare and record program budgets (including for specific projects).
8. Compare the financial acquittals to the budget costs and report significant variances. These shall be considered and (if of major concern) dealt with using the ISO-9001-based noncompliance reporting system.

## **Detecting, Reporting and Eliminating Partner Fraud and Corruption**

The CEO, and delegated Managers, shall –

- a) Assist implementing Partner Organisations to establish fraud prevention policies and procedures, and regularly review, amend (if required) and approve the policies and procedures,
- b) Provide fraud prevention training (See Training section of this document),
- c) Initiate discussions to facilitate the prevention,
- d) Assist Partner Organisation to detect and investigate fraud,
- e) Review and approve Partner Organisations' fraud prevention policies (included in the relevant MOU), including key controls for the mitigation of fraud,
- f) Assist with appropriate fraud investigations, should the need arise. Report any fraud and suspected fraud associated with the implementing Partner Organisations through the ISO 9001-based "Nonconformance Reporting and Improvement Request."
- g) Ensure that whistle blowers are afforded protection, in accordance with Policy No. P23040317-1 Complaints, Whistle Blowing, Incidents
- h) Report any suspected fraud, corruption or money laundering to the appropriate police force and any other appropriate government instrumentality, including AUSTRAC.
- i) Obtain from implementing Partner Organisations financial annual acquittals to for the expenditure of all donations and grants made by Partner Housing Australasia, financial accounts, balance sheet, and profit-and-loss statements for their organisations, including programs that were not funded by Partner Housing Australasia,
- j) Implement the following program funding and administration practices, aimed at detecting and minimising fraud –
  - a. Provide standardised designs, costed bills of quantities and standardised cost estimates for materials, labour and overheads for all programs funded (or partially funded) by Partner Housing Australasia. This enables close scrutiny of expenditure.
  - b. Monitor and report to the Board quarterly the financial performance and construction outcomes of each program.
  - c. Where necessary (such as major purchases for the Solomon Islands water reticulation program), Partner Housing Australasia shall pay directly the suppliers of materials, components and transport Labour and minor costs are re-imbursed on receipt of invoices which are reviewed by the Partner Housing Australasia Regional Manager and approved in accordance with the delegation of authority.

## Partner Organisations MOU Requirements

For donor-funded programs (including, but not limited to programs funded by DFAT), Partner Housing Australasia shall ensure that its MOUs reflect the anti-fraud and anti-corruption requirements the donor organisation. This shall include requirements that –

*Partner Housing Australasia, Vision for Homes, South Ranongga Community Association, other Partner Organisations, and their personnel shall*

- *not engage in any fraud. Fraud must be actively prevented and detected, including by the partners personnel;*
- *adhere to the relevant conflict of interest and confidentiality clauses;*
- *ensure that the partner or its personnel do not make or cause to be made, receive or seek to receive any offer, gift, payment or benefit of any kind, which could be construed as an illegal or corrupt act;*
- *within one month of Project Start Date: conduct a fraud risk assessment and produce a fraud control strategy in compliance with the Commonwealth Fraud Control Framework available at <https://www.ag.gov.au/integrity/publications/commonwealth-fraud-control-framework>;*
- *ensure risk assessments and strategies contain appropriate fraud prevention, detection, investigation and reporting processes and procedures;*
- *ensure that personnel are responsible and accountable to the funding recipient for preventing and reporting fraud as part of their routine responsibilities. (This includes reporting potential fraud matters within five (5) business days. A template of the 'Fraud Referral Form' is located here.);*
- *respond within five (5) business days to any further requests for information by DFAT;*
- *investigate any fraud and bear the cost of the investigation in accordance with any directions or standards required by DFAT;*
- *have access to an investigator (internal or appointed) that possesses the minimum qualifications specified in the Australian Government Investigation Standards or an equivalent agreed to by DFAT;*
- *provide reasonable assistance and bear associated costs should DFAT choose to appoint its own investigator in accordance with the contract terms;*
- *report any suspected offenders identified as part of the investigation to the appropriate law enforcement agencies, unless the Director of DFAT- Fraud Control Section agrees otherwise in writing;*
- *repay funds lost to fraud committed by the recipient organisation, their employees or contractors, including taking recovery action in accordance with recovery procedures (including civil litigation) available in the partner country;*
- *act in accordance with the Commonwealth Procurement Rules, of which due diligence assessments are a component.*

## Compliance and Auditing

The CEO shall implement the following:

- Initiate the required monitoring, evaluation and learning functions associated with this “Policies and Procedures” document.
- Initiate both internal and external auditing, consistent with ISO 9001 principles of the policies and procedures herein.
- Ensure that the compliance with the policies and procedures herein, and the associated internal and external audits, are recorded in the associated “Compliance and Audit Records” documents.

## Training

The CEO shall ensure that Directors and Managers have an understanding of the Partner Housing Australasia accounting practices, controls, financial management, including detecting and eliminating fraud. To achieve this end, the CEO shall distribute a reference and link to this “Policies and Procedures” document to all Directors, Manager, and Partner Organisation Managers, and other personnel working on behalf of the organisation. (Partner Housing Australasia is a voluntary organisation and does not employ staff).

The Finance Manager shall –

- a) Be a practising Chartered Accountant;
- b) Undertake routine Continuing Professional Development, required by CPA registration.
- c) Participate in the 10-hour online CPA Australia “Financial Investigation and Forensic Accounting” (see below);
- d) Study the DFAT anti-fraud training material (see below);
- e) Provide instruction to the other Partner Housing Australasia Directors

All Directors and Managers shall –

- a) Receive training by the Finance Manager (or delegated Trainer) on the accountancy principles and practices, including the detection and elimination of fraud, as set out in the DFAT and CPA training material; and
- b) Study the DFAT anti-fraud training material (see below).

DFAT Fraud Toolkit - YouTube <https://www.youtube.com/watch?v=nH4QMF3zfrM>

fraud-control-toolkit-for-funding-recipient.docx (live.com)

<https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.dfat.gov.au%2Fsites%2Fdefault%2Ffiles%2Ffraud-control-toolkit-for-funding-recipient.docx&wdOrigin=BROWSELINK>

### Financial Investigation and Forensic Accounting

10-hour online CPA Australia <https://www.cpaaustralia.com.au/contact-us>

#### Description

This online course will arm you with key knowledge on fraud detection, investigation and prevention based on real life experiences of forensic practitioners. Also take this opportunity to learn new approaches to fraud and become more effective in your work.

#### Key topics

- The forensic accountant as an expert witness
- Forensic investigation
- Forensic technology
- Recording and case presentation
- Fraud detection tools and techniques
- Fraud and corruption control

This course consists of one online course, a downloadable PDF learning manual and one online assessment.

#### Learning objectives

- Discuss current trends in fraud and corruption in Australia and globally.
- Implement fundamental techniques in the investigation & detection of fraud.

- Describe how to prepare and present a forensic case involving allegations of fraud.
- Provide guidance on fraud prevention principles as promoted by AS 8001:2008 Fraud and Corruption Control.

#### Audience

This course is specially designed for:

- Public practitioners including sole practitioners at the partner and director level
- Those working in Government (federal, state, local and business/enterprise)
- Academic professionals
- Practitioners in insolvency, auditing (internal and external), risk and advisory.