

Financial and Fraud Risk Management Policy

Version 7.0 – October 2025

Cerebral Palsy Support Network Inc. (CPSN) recognises its responsibility to safeguard organisational integrity, financial assets, and the trust placed in us by our members, clients, staff, and stakeholders.

It is the responsibility of CPSN to ensure that sound financial management and fraud prevention systems are established, maintained, and regularly reviewed, and that they are appropriate, proportionate, and effective in mitigating identified financial and fraud risks.

CPSN is committed to ensuring that all workers involved in financial processes receive the appropriate training, information, and supervision to perform their duties with transparency, accountability, and integrity.

As part of CPSN's broader risk management framework, this policy supports the prevention, detection, and response to financial fraud or mismanagement and ensures that financial controls are aligned with legislative, contractual, and ethical obligations.

To reduce the risk of financial loss or reputational harm, CPSN maintains a culture of integrity and accountability in accordance with the organisation's Code of Conduct and Work Health and Safety obligations, providing a safe and secure environment for staff and clients alike.

Record of policy development

Version	Date approved	Date for review
Version 7	October: 2025	2027: October

Responsibilities and delegations

This policy applies to:	This policy applies to all Board members, staff, contractors, and volunteers.
Policy approval:	Board
Review of Policy Compliance	CEO
Specific responsibilities:	Board CEO Treasurer Accountant CPSN Leadership Team

Policy context

Service Standards	NDIS Practice Standards and Quality Indicators, November 2021 Version 4. NDIS Practice Standards Australian Accounting Standards Australian / New Zealand Risk Management Standard (AS/NZS ISO 31000:2009)
Legislation	National Disability Insurance Scheme Act 2013 (Cth) Competition and Consumer Act 2010 (Cth) Charities Acts (Consequential Amendments and Transitional Provisions) Act 2013 (Cth) (the Charities Consequential and Transitional Act) Income Tax Assessment Act 1997 A New Tax System (Goods and Services Tax) Act 1999 Fringe Benefits Tax Assessment Act 1986 Superannuation Act 1973
Contractual obligations	NDIS Practice Standards Provider Governance and Operational Management
Organisation policies	Human Rights Policy Framework Practice Governance Policy Framework Risk Management Policy CPSN Code of Conduct



Other Conventions

United Nations Convention on the Rights of People with Disabilities (CRPD), 2006
Charter of Human Rights and Responsibilities Act 2006, Victoria

Definitions

Employee means a person who is employed by CPSN with wages or salary.

Staff means all the people employed by CPSN or within a specific work area.

Worker means any person engaged by CPSN to perform a service, paid or unpaid, and may include but is not limited to employees, consultants, contractors, employees of a labour hire company, apprentices, trainees, students or volunteers.

Policy statement

Purpose - Cerebral Palsy Support Network Inc (CPSN) is committed to transparent, safe, and secure financial management and addressing fraud risk whilst ensuring the timely reporting of obligations.

The outcomes of implementing this policy are as follows:

- Finances are efficiently and effectively managed to support the organisation in its strategic outcomes
- Accurate, complete, and transparent financial procedures and records
- All financially related contractual and legislative requirements are met
- Financial and fraud risk is minimised

Principles

CPSN is committed to honesty, integrity, and best practice in all aspects of its operations. The following principles underpin these processes:

- Financial decisions are made within a sound accountability framework, using robust and transparent systems including a Delegation of Authority matrix with appropriate segregation of duties
- Effective financial management enables the organisation to maximise finances available for application to CPSN's strategic objectives
- The Board holds ultimate accountability for the financial management of the organisation, however staff contractors and volunteers are responsible for implementing financial policy and practices with clearly defined roles and resources
- Financial and Fraud risk is minimised within the strategic, consistent, and organisation-wide approach to risk management articulated in the Risk Management Policy
- All staff act ethically, with integrity, honesty and transparency in accordance with the Code of Conduct.

Implementing this policy

IMPLEMENTING THIS POLICY

Within CPSN the following roles communicate and operationalise this policy:

Roles and Responsibilities - The Board



The Board will approve and review this policy.

The Board has the overall responsibility for the financial and strategic direction and decisions of CPSN. The Board has legal responsibilities including compliance with the requirements of a range of federal, state, and local government laws and regulations.

The Board has financial responsibilities to ensure that there are adequate funds for the operation of the organisation, the organisation works within the limits of these funds, records are kept, and funds accounted for.

The Board as a whole, together with individual members of the Board will:

- Comply with organisational Financial Management policy and practices
- Comply with all internal and external financial reporting, contractual and legislative requirements
- Approve the annual budget which sets the parameters and KPI's for annual expenditure
- Ensure financial performance via agreed KPIs, plans and budgets
- Approve regular finance and other reports in accordance with Board issued delegations/ KPIs
- Review financial authorities and delegations at least annually
- Ensure an approved external auditor conducts an annual audit of the organisation's accounts
- Approve the opening and closing of any bank account and the investment of funds.
- Identify and record financial fraud risks so that they can be controlled and managed.

The Treasurer

The Treasurer is responsible for providing leadership and oversight of the organisation's financial management in addition to the general financial responsibilities of all Board members. This includes the following matters:

- Acting on financial matters when action is required in advance of a Board meeting
- Recommend annual audited finance report to the membership and/or Board at annual general meeting.

The CEO

The CEO is responsible for delegating responsibility for financial, people and culture, operations, record keeping, policy development and accountability to the CPSN Leadership Team.

The CEO is responsible for working with the Treasurer, Finance & Audit Committee and Board in implementing effective financial management of the organisation. The CEO will be responsible for the following:

- Provide leadership and action financial management.
- Develop and work with the Finance & Audit Committee & Board in developing financial plans and budgets.
- Ensure accurate, appropriate, and timely financial reporting as required internally and externally.
- Delegate and supervise financial management positions and activities as required
- Approves and ensures the implementation of an Internal Compliance Review Plan
 - Ensuring that financial and fraud management procedures are communicated to staff and are in line with this Policy, the Code of Conduct and Values of CPSN
 - Ensuring finance staff are trained and equipped to work to documented financial management and procedures
 - Report on outcomes of the Internal Compliance Review Plan

The Accountant

The Accountant is responsible for the following:

- Maintaining accounting records including those that comply with current Australian Accounting Standards
- Processing all approved income and expenditures
- Alerting the CEO to any concerns that arise regarding accounts, payroll or financial administration of the CPSN
- Ensuring all invoices for payment have been approved in line with the Delegation of Authority



- Preparing/ assisting in the development of financial budgets, plans, statements, and reports
- Preparing for and assisting the annual external audit
- Approving payment of staff salaries and other payments
- Maintaining the asset register.

CPSN Leadership Team

The Leadership Team are responsible for the following:

- Communicating and supporting staff in understanding their responsibilities under this policy
- Ensuring procedures and work instructions are clear to staff and the potential for Fraud (and its reporting) is taken into account
- Monitoring implementation and contributing to review of policy
- Implementing reviews under the Internal Compliance Review Plan

Procedures applying to this Policy

Finance Procedure Manual

Delegation of Authority Document

End of document

