

NORTHERN BAY P-12 COLLEGE ACTUAL OR SUSPECTED FRAUD POLICY NBC009

1. RATIONALE

School Council have responsibility for monitoring effective prevention strategies for fraud. This policy is a VRQA requirement.

2. BROAD GUIDELINES

- 2.1. The College will not tolerate fraud in any aspect of its operations.
- 2.2. The College will investigate any suspected acts of fraud, misappropriation or other similar irregularity.
- 2.3. An objective and impartial investigation, as deemed necessary will be conducted regardless of the position, title, length of service or relationship with the organisation of any party who might be the subject of such investigation.
- 2.4. Any fraud shall constitute grounds for dismissal. Any serious case of fraud, whether suspected or proven, shall be reported to the police. Any person reporting a fraud, or a suspected fraud, shall suffer no penalty in their employment.

3. IMPLEMENTATION

- 3.1. The Council has ultimate responsibility for the prevention and detection of fraud and is responsible for ensuring that appropriate and effective internal control systems are in place.
- 3.2. In the first instance, the Principal is responsible for investigating instances of fraud reported to them. If the Principal is the subject of a fraud instance, this is to be reported to the School Council President.
- 3.3. The Council and Principal must ensure that there are mechanisms in place within their area of control to:
 - 3.3.1. Assess the risk of fraud;
 - 3.3.2. Educate employees about fraud prevention and detection; and
 - 3.3.3.** Facilitate the reporting of suspected fraudulent activities.
- 3.4. The Campus Principal should be familiar with the types of improprieties that might occur within his/her area of responsibility and be alert for any indications of such conduct.
- 3.5. All staff/volunteers/contractors share in the responsibility for the prevention and detection of fraud in their areas of responsibility.
- 3.6. All staff/volunteers/contractors have the responsibility to report suspected fraud.
- 3.7. Any staff member, volunteer or contractor who suspects fraudulent activity must immediately notify the Principal or School Council if the Principal is suspected of fraudulent activity.
- 3.8. Fraud prevention accounting procedures shall be incorporated in the College's policies relating to Authority to Sign Cheques, Reimbursement of Expenses, Financial Transaction (credit and debit) Cards, Acceptable Use of Computers, Acceptable Use of Vehicles and Equipment, Cash Management & Income Handling, and any other relevant policies. All complaints of suspected fraudulent behaviour must be reported to the Principal.
- 3.9. Upon notification or discovery of a suspected fraud, the Principal will promptly arrange to investigate the fraud. The Principal will make every effort to keep the investigation confidential; however, from time to time School Council will need to be consulted in conjunction with the investigation.
- 3.10. After an initial review and a determination that the suspected fraud warrants additional investigation, the Principal shall coordinate the investigation with the appropriate law enforcement officials. Internal or external legal representatives will be involved in the process, as deemed appropriate.
- 3.11. Once a suspected fraud is reported, immediate action will be taken to prevent the theft, alteration, or destruction of relevant records needs to occur. Such actions include, but are not necessarily limited to, removing the records and placing them in a secure location, limiting access to the

location where the records currently exist, and preventing the individual suspected of committing the fraud from having access to the records.

- 3.12. Where a prima facie case of fraud has been established the matter shall be referred to police. Any action taken by police shall be pursued independent of any employment-related investigation by the College.
- 3.13. If a suspicion of fraud is substantiated by the investigation, disciplinary action, up to and including dismissal, shall be taken by the Principal or in the case of the Principal, the Council.
- 3.14.** The College will also pursue every reasonable effort, including court ordered restitution, to obtain recovery of the losses from the offender.
- 3.15. No employee of the College, or person acting on behalf of the College in attempting to comply with this policy shall:
 - 3.15.1. be dismissed or threatened to be dismissed;
 - 3.15.2. be disciplined or suspended or threatened to be disciplined or suspended;
 - 3.15.3. be penalised or any other retribution imposed, or
 - 3.15.4. be intimidated or coerced, based to any extent upon the fact that the employee has reported an incident or participated in an investigation in accordance with the requirements of this policy. Violation of this section of the policy will result in disciplinary action, up to and including dismissal.
- 3.16. If an allegation is made in good faith, but it is not confirmed by the investigation, no action will be taken against the originator.

4. EVALUATION

- 5. This document is to be reviewed annually as part of the College’s policy review cycle.

Document #	Committee Responsible	Review Date	Public Location	Ratified by School Council:
NBC009	Finance Committee	Jan 2019	Website, Intranet NBC Public Policies	Feb 2018
	Related document			