



## Fraud Policy

This document is the parent policy for any College procedures or regulations. Questions regarding this policy are to be directed to the identified Policy Administrator.

### Policy Statement:

The Board of Governors is committed to the protection of the College, its operations, members of the College community and its assets from the consequences of fraudulent activities. Fraud and/or the concealment of fraud are strictly forbidden and will not be tolerated by the College. It is the duty of all members of the College community to report fraud.

<b>Sponsor:</b>	Human Resources
<b>Policy Owner:</b>	Executive Director, Human Resources and Health & Safety
<b>Policy Administrator:</b>	Executive Director, Human Resources and Health & Safety
<b>Approved By:</b>	Board of Governors
<b>Approval Date:</b>	January 23, 2020
<b>Effective Date:</b>	January 23, 2020

<b>Objective:</b>	<p>The objective of this policy is to:</p> <ol style="list-style-type: none"> <li>1. State the College’s position with respect to Fraud;</li> <li>2. Improve the knowledge and understanding of the College Community to the potential risks of fraud;</li> <li>3. Establish responsibilities regarding the prevention, detection and investigation of Fraud;</li> <li>4. Establish clear rules, actions and protocol as to what to do when Fraud is detected or suspected;</li> <li>5. Ensure a consistent, prompt response to reports of actual or suspected Fraud;</li> <li>6. Uphold the College’s fiduciary responsibility as a public institution; and</li> <li>7. Create strategies to manage risks to the College’s reputation.</li> </ol>
<b>Guidelines:</b>	<ol style="list-style-type: none"> <li>1. The College values the integrity of the members of the College Community and recognizes the key role they play in prevention and reporting of Fraud. All members of the College Community have an obligation to refrain from engaging in fraud and inform themselves about this policy and risks arising from College processes which may create a vulnerability to Fraud.</li> <li>2. Where a report of actual or suspected Fraud is made concerning:             <ol style="list-style-type: none"> <li>A. A member of the College Community (other than the President or a member of the Board of Governors), the report shall be submitted to the President.</li> <li>B. The President, the report shall be submitted to the Chair of the Board of Governors;</li> <li>C. A member of the Board of Governors, the report shall be submitted to the Chair of the Board of Governors; and</li> <li>D. The Chair of the Board of Governors, the report shall be submitted to the Vice Chair of the Board and the President.</li> </ol> </li> </ol>

	<ol style="list-style-type: none"> <li>3. The individual receiving the report of actual or suspected Fraud in accordance with section 2 shall have the authority to investigate the report, and to retain legal counsel in accordance with the Fraud Procedure.</li> <li>4. Where a member of the College Community fails to report actual or suspected Fraud, he or she may be subject to disciplinary action or other legal consequences with regard to his or her relationship with the College.</li> <li>5. An individual who in good faith reports actual or suspected suspicion of fraud will be protected from retaliation by the College and members of the College Community. An individual making a report of actual or suspected Fraud in bad faith will be subject to disciplinary action or other legal consequences with regard to his or her relationship with the College.</li> <li>6. The College, to the extent possible, will recover any losses incurred as a result of Fraud.</li> <li>7. Unlawful acts may be reported to the applicable law enforcement agency.</li> <li>8. The President shall from time to time create and amend processes under this policy provided that they are not inconsistent with this policy.</li> <li>9. This policy does not supersede any other legal or policy-based process resulting in a report of actual or suspected Fraud.</li> </ol>
<p><b>Definitions:</b></p>	<p><b>College Community</b> includes employees, students, contractors, the Board of Governors, Community Education Committees, and other individuals formally associated with Northern Lakes College.</p> <p><b>Employee</b> refers to a person retained as an employee by the College.</p> <p><b>False Accounting</b> is dishonestly destroying, concealing, altering or falsifying an account, record or document (paper or electronic) required for any accounting purpose, or furnishing others with information which may be misleading, false or deceptive.</p> <p><b>Fraud</b> is deception with the intention of gaining an advantage, avoiding an obligation, or causing a loss to another person or organization, and includes (without limitation): deception, bribery, forgery, extortion, corruption, theft, conspiracy, misappropriation, false representation, False Accounting, concealment or non-disclosure of material facts, misrepresentation of professional or academic records, identity theft, authorization of receiving payment for work not completed or expenses not incurred, or collusion with another to engage in Fraud.</p>

<p><b>Related Northern Lakes College Documents:</b></p>	<p>Human Resources – Fraud Procedure</p>
<p><b>Related External Information:</b></p>	<p>N/A</p>
<p><b>Stakeholders Consulted:</b></p>	<p>Employee Management Advisory Committee: Apr 30, 2009; Dec 19, 2019 Policy Review Committee: Jan 14, 2020</p>

	Risk Management Committee: Apr 30, 2009 Senior Management Team: May 11, 2019; Jun 14, 2014
<b>Next Review Date:</b>	January 23, 2025
<b>Revision History:</b>	June 23, 2009: New June 25, 2014 January 23, 2020 February 25, 2020: New template