

FRAUD PREVENTION

Approval Authority	President
Responsible Executive	Chief Financial Officer and Vice-President Administration
Related Policies / Legislation	Board Policy Direction on Values and Ethics (BPD-201) Board Policy Direction on Risk Management (BPD-220) Board Policy on Safe Disclosure (BRP-220.01) Board Policy Direction on Financial Management (BPD-205) Statement on Institutional Ethics (22) Safe Disclosure (223) Conflict of Interest (142) Signing Authority (200) Procurement (130) Appropriate Use of Information Technology Resources (14) Responsible Conduct of Research and Scholarship (53) Student Academic Misconduct (70)

PURPOSE

The purpose of this policy is to state the University's position on fraud and to outline the process for reporting and responding to suspected fraudulent activities.

SCOPE

This policy applies to the university's board members, employees, students, volunteers, contractors, vendors, and partners to the extent that university resources are involved or impacted and to the extent it is reasonably applicable.

DEFINITIONS

In this policy, the following definitions apply:

Assets means all property of the university, including but not limited to equipment, financial assets, real property such as land, vehicles, materials, uniforms, cell phones, computers and associated equipment, email, internet services, records, information, and work time.

Fraud means a deliberate and/or unlawful deception with the intention of obtaining an unauthorized benefit from the university for personal gain. Fraud includes, but is not limited to:

- misappropriation of university funds or property
- forgery or alteration of documents and the inappropriate, deliberate destruction of documents, including e-documents

- authorizing or receiving payment for work, goods or services not received or performed
- altering or deliberately reporting incorrect financial or personal information for either a personal or university advantage
- unauthorized use of university property and resources for personal advantage or gain
- any claim for reimbursement of ineligible expenses or unearned payment of fees or wages
- bribery, kickbacks, or unauthorized rebates
- identity theft
- misrepresentation of credentials or status with the university
- any fraudulent activity as defined by the Criminal Code (s. 380 (1))

Good faith means a sincere belief or motive without any malice or the desire to defraud others.

Internal controls mean processes and systems put in place to provide reasonable assurance that assets are safeguarded and that these processes and systems effectively manage risk and diminish the occurrence of fraud.

POLICY

The University of the Fraser Valley (UFV) is committed to maintaining the highest standard of honesty, integrity, and transparency and to protecting itself against fraud.

All members of the university must act with integrity and honesty in support of the work of the university and to protect its assets and resources. Fraud or concealment of fraud is not tolerated.

UFV establishes and maintains an internal control framework that reasonably prevents and detects fraud.

UFV recognizes that good faith reporting of suspected instances of fraud is necessary and expected. Persons who have evidence of theft, fraud, or other misappropriation of university assets should disclose such evidence to persons in authority at the university.

Any individual acting in good faith who reports incidents of suspected fraud may do so freely and without fear of reprisal with protection under the *Safe Disclosure Policy (223)*.

All instances of suspected fraud are investigated independently and without bias. Any investigation performed under this Policy is in accordance with applicable procedures and provisions of the Collective Agreement, legislation, and university policy.

Measures are taken to recover any losses incurred as a result of confirmed fraudulent activities, up to and including legal remedies.

The CFO & VP Administration has primary responsibility for operationalizing procedures associated with this policy.

Authority, Roles, and Responsibilities:

The President, as delegated by the Board of Governors, is accountable for the management and implementation of strategies to manage fraud risk within the university's enterprise risk management framework.

The President and Vice-Presidents promote a culture of high standard ethical conduct and integrity and support fraud prevention activities.

The Chief Financial Officer & Vice-President Administration (CFO-VPA) leads the coordination of activities aimed at mitigating fraud risk.

Incident Reporting:

An employee, student or member of the public who has reason to believe that an employee of the university is engaged in fraudulent activity reports the fraud to a person or entity with the power to take corrective action, as follows:

- A university employee who has reason to believe an individual or group of individuals is engaged in fraud at the university normally reports it to their immediate supervisor or to the next appropriate management level
- A student or member of the public who has reason to believe an individual or group of individuals is engaged in fraud at the university normally reports it to an administrator (Director, Vice-President, or the President as appropriate)

Investigation and Reporting:

As appropriate, the complaint may be dealt with by:

- Referral to the police or appropriate authorities
- Referral to the external auditor
- Investigation by management
- Referral to the Board of Governors
- Referral to an independent investigator

The CFO-VPA or designate, engages all necessary and appropriate internal and/or external resources and advisors as deemed necessary to complete an investigation of the potential fraud incident carefully and fairly, respecting privacy and confidentiality as appropriate.

Employees who commit an act of fraud are subject to disciplinary action, up to and including termination with cause, as well as possible criminal charges.

The CFO-VPA maintains a register of fraud instances including summary reports and status updates.

The details of an investigation, analysis of the facts, allegations, and conclusions, are disclosed only to those persons who need the information for the investigation, for the implementation of the decision, or unless required by this policy or law.