



POLICY STATEMENT

Policy Name	Fraud Prevention and Reporting		
Policy #	405	Category	Finance
Policy Sponsor	Associate Vice-President, Financial Services	Previous Revision Date	June 18, 2018
Policy Approved by	President & CEO	Issue or Revision Date	September 7, 2023
Procedures Approved by	CFO & Vice-President, Administrative Services	Review Date	June 2028

See the related [PROCEDURES](#).

PURPOSE

The purpose of this policy is to ensure consistent and effective investigation, reporting and disclosure of fraud occurrences within Sask Polytech (Sask Polytech).

SCOPE

This policy applies to all Sask Polytech faculty, staff, students, Board of Directors, and anyone who is in a business relationship with Sask Polytech, and who are herein referred to as employees.

GUIDING PRINCIPLES

1. Sask Polytech is committed to maintaining the highest standards of honesty, integrity, and ethical conduct.
2. Fraud, in any form, will not be tolerated. This includes acts of fraud committed against Sask Polytech as well as acts committed against outside parties to the benefit of Sask Polytech or individuals employed by Sask Polytech.
3. Members of the Sask Polytech community who report acts of suspected fraud may do so freely and without fear of reprisal.

POLICY

1. 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.
2. The prevention of fraud is the responsibility of all employees within Sask Polytech. Employees who suspect fraud must report the suspected fraud to one or more of the following: their manager, a Vice-President, an Associate Vice-President, the President & CEO, or in extreme cases, the chair

of the Sask Polytech Board of Directors Audit and Risk Committee. Failure to report a fraud may result in an investigation and discipline of the employee who fails to report it as well as an investigation of the employee(s) who actively commits the fraud.

3. Employees will not be subject to any discrimination, threats, reprisals, or disciplinary action by Sask Polytech, as a consequence of reporting a suspected fraud and/or acting as a witness in an investigation or a court proceeding in relation to an alleged fraud.
4. All employees involved in an investigation of suspected fraud or irregularity maintain the rights, privileges and protections afforded to them by applicable law, by Sask Polytech policies, and by the collective bargaining agreements.
5. Employees who make vexatious (unjustified or inappropriate) reports of fraud will be investigated and are subject to disciplinary action, up to and including termination with cause.
6. Sask Polytech will pursue full recovery of all losses resulting from an act of fraud.
7. Sask Polytech is required to notify the Ministry of Advanced Education quarterly of all losses of money or property over \$500 that are due to fraud or similar illegal acts. Items submitted to the Ministry will be reported publicly through a quarterly news release.

DEFINITIONS

Business Relationship: The connection between all stakeholders in the process of doing business, such as employer-employee relationship, or outsourced business partners in understanding and supporting inter-business activities. A relationship established between a reporting entity and a stakeholder to conduct transactions or provide services related to verified transactions.

Fraud: The intentional deception, false representation, or concealment of facts for the purpose of personal gain to obtain an advantage for oneself or for one or more third parties, or to avoid an obligation. Fraud includes inducing another party to act upon intentional deception, false representation or concealment to that party's injury or financial loss. Actions constituting fraud include, but are not limited to:

- forgery or alteration of a cheque, bank draft, or any other financial instrument
- destruction or theft of funds, securities, supplies, or other assets
- forgery or alteration of any document or account belonging to Sask Polytech
- false accounting or any impropriety in the handling or reporting of money or financial transactions
- bribery
- corruption (a form of dishonesty undertaken often to acquire personal benefit)
- profiteering as a result of insider knowledge of Sask Polytech or Sask Polytech client activities
- disclosing confidential or proprietary information to outside parties
- in conjunction with Conflict of Interest policy #704, providing or accepting gifts of material value to/from customers, contractors, vendors or other persons doing or attempting to do business with Sask Polytech that are intended to influence a business decision or selection process
- intentionally misrepresenting others' intellectual property as one's own
- conspiracy to commit any of the above; or
- any similar or related inappropriate conduct.

RELATED POLICIES/DOCUMENTS

[Conflict of Interest Policy 704](#)

[Code of Conduct Policy 703](#)

APPLICABLE LEGISLATION OR REGULATIONS

Reporting Incidents of Fraud or Similar Illegal Acts, Financial Administration Manual, Government of Saskatchewan

The Public Interest Disclosure Act, Government of Saskatchewan