



## POLICY STATEMENT

Policy Name	<b>Fraud Prevention and Reporting</b>		
Policy #	<b>405</b>	Category	<b>Finance</b>
Policy Sponsor	<b>Associate Vice-President, Financial Services</b>	Previous Revision Date	<b>February 1, 2011</b>
Policy Approved by	<b>President &amp; CEO</b>	Issue or Revision Date	<b>June 18, 2018</b>
Procedures Approved by	<b>CFO &amp; Vice-President, Administrative Services</b>	Review Date	<b>June 2023</b>

See the related [PROCEDURES](#).

### PURPOSE

The purpose of this policy is to ensure consistent and effective investigation, reporting and disclosure of fraud occurrences within Saskatchewan Polytechnic.

### SCOPE

This policy applies to all Saskatchewan Polytechnic faculty, staff, students, Board of Directors and anyone who is in a Business Relationship with Saskatchewan Polytechnic, and who are herein referred to as 'employees'.

### GUIDING PRINCIPLES

1. Saskatchewan Polytechnic 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 Saskatchewan Polytechnic as well as acts committed against outside parties to the benefit of Saskatchewan Polytechnic or individuals employed by Saskatchewan Polytechnic.
3. Members of the Saskatchewan Polytechnic 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 Saskatchewan Polytechnic. 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 Saskatchewan Polytechnic Board of Directors Audit 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 Saskatchewan Polytechnic, 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 Saskatchewan Polytechnic 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. Saskatchewan Polytechnic will pursue full recovery of all losses resulting from an act of fraud.
7. Saskatchewan Polytechnic 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. All items submitted to the Ministry will be reported publically 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 Saskatchewan Polytechnic;
- 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 Saskatchewan Polytechnic or Saskatchewan Polytechnic 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 Saskatchewan Polytechnic 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

N/A

## **APPLICABLE LEGISLATION OR REGULATIONS**

- *Reporting Incidents of Fraud or Similar Illegal Acts, Financial Administration Manual, Government of Saskatchewan*
- *Bill 609, The Whistleblower Protection Act, Government of Saskatchewan*