

 <b>CAPILANO UNIVERSITY</b>		<b>POLICY</b>	
Policy No.	Officer Responsible		
<b>B.217</b>	<b>Vice President, Finance and Administration</b>		
Policy Name			
<b>Fraud Prevention and Investigation</b>			
Approved by	Replaces	Category	Next Review
<b>Board</b>	<b>New</b>		<b>June, 2028</b>
Date Issued	Date Revised	Related Policies	
<b>June 27, 2023</b>		<b>B.310 Protected Disclosure (Whistleblower) Policy</b>	

## 1. PURPOSE

- 1.1 Capilano University (“the University”) requires all employees, students, Board of Governor members, and individuals acting on the University’s behalf to at all times act honestly and with integrity, and to safeguard the public resources for which they are responsible.
- 1.2 This Policy and related procedures:
- a) reinforces the University’s commitment to ensure fraud prevention strategies are robust, and to foster an environment that promotes fraud awareness;
  - b) provides guidance to the University community on how to report suspected or known fraud; and
  - c) establishes a fair, impartial and competent investigation process to deal with reports of fraudulent activity.

## 2. DEFINITIONS

**Assets:** all University property including but not limited to: equipment; financial assets; real property such as land; vehicles, equipment; supplies; email; internet services; trade secrets; intellectual property or services; and work time.

**Fraud:** 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:

- a) misappropriation, misapplication or theft of University assets;
- b) any breach of a finance-related fiduciary duty or obligation of confidentiality;

- c) forgery or alteration of documents and the inappropriate, deliberate destruction of documents, including e-documents;
- d) authorizing or receiving payment for work, goods or services not received or performed;
- e) altering or deliberately reporting incorrect financial or personal information for either a personal or University advantage;
- f) unauthorized use of University property and resources for personal advantage or gain;
- g) any claim for reimbursement of ineligible expenses or unearned payment of fees or wages;
- h) bribery, kickbacks, or unauthorized rebates;
- i) identity theft;
- j) misrepresentation of credentials or status with the University; and
- k) any fraudulent activity as defined by the Criminal Code (s. 380 (1))

**Good faith:** honestly intended actions based on reasonable belief and which are not malicious, frivolous or vexatious in nature.

**Employee:** any person employed by the University.

**Internal controls:** 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.

**Member of the University community:** employees, students, agents, board members and volunteers.

**Reprisal:** an act of retaliation such as to harass, discriminate, threaten, demote, discipline, suspend, dismiss or otherwise disadvantage the individual, adversely affect the individual's employment, enrolment, working conditions or learning conditions, or deny the individual a benefit.

**Student:** an individual enrolled in any course (credit or non-credit) at the University.

### 3. SCOPE

3.1 This Policy applies to:

- a) all members of the University community and anyone acting on the University's behalf or under its direction;
- b) any actual or suspected instances of fraud that involve University assets.

### 4. POLICY STATEMENT

4.1 The University has established and maintains an internal control framework including financial

risk monitoring processes that reasonably prevents and detects Fraud

- 4.2 The University periodically conducts financial risk assessments in accordance with the University's ongoing risk management program.
- 4.3 Fraud or the concealment of Fraud will not be tolerated.
- 4.4 Individuals reporting incidents of suspected fraud in Good Faith may do so freely and without fear of Reprisal in accordance with B.310 Protected Disclosure (Whistleblower) Policy
- 4.4 The University will investigate any report of suspected Fraud.
- 4.5 Members of the University and individuals acting on behalf of the University or under its direction who engage in Fraud will be subject to appropriate discipline.
- 4.6 If an alleged Fraud appears to constitute an offence under the Criminal Code, the University will notify the appropriate law enforcement or regulatory authorities.
- 4.7 The University will seek to recover any losses incurred as a result of Fraud.

## **5 ROLES AND RESPONSIBILITIES**

- 5.1 It is the responsibility of each Member of the University Community to safeguard and protect the University from the misuse or loss of University Assets. All Members of the University Community are encouraged to report instances of suspected or known Fraud
- 5.2 The Vice-President, Finance and Administration is the Designated Officer responsible for leading the coordination of activities aimed at mitigating Fraud risk, coordinating investigations when allegations of Fraud are made and making sure that appropriate action is taken in response.
- 5.3 The Directors, Financial Operations and Financial Reporting are responsible for developing and maintaining the University's internal control framework including financial risk monitoring processes.
- 5.4 The Director, Risk Management is responsible for supporting the Directors, Financial Operations and Financial Reporting in periodically conducting financial risk assessments and for commissioning and facilitating internal audit exercises focused on activities that have been identified as vulnerable to Fraud.
- 5.5 Senior Leadership and Administrators are responsible for making sure that:
  - a) this Policy is understood and complied with within their faculties and departments; and
  - b) appropriate controls are in place to minimize the likelihood of fraudulent activity in the areas under their leadership.

## **6 REPORTING AND INVESTIGATION**

- 6.2 Any Member of the University Community who has reason to believe, in Good Faith that an individual or group of individuals is engaged in Fraud at the University should immediately report following the process set out in B.217.1 Fraud Reporting and Investigation.:
- 6.3 Reporting individuals must not contact those they suspect of Fraud or discuss the specifics of the case, facts, suspicions, or allegations with anyone except as directed by the Vice President, Finance and Administration or if required to disclose by law.
- 6.4 The Vice President Finance and Administration will lead and/or coordinate all investigations into reports of Fraud in accordance with Procedure B217.1 Fraud Reporting and Investigation
- 6.5 The Vice President, Finance and Administration will maintain a register of Fraud instances including summary reports and status updates.
- 6.6 The Vice President, Finance and Administration will make regular reports to the Audit and Risk Committee on:
- a) the system of internal controls regarding financial reporting, accounting compliance and the prevention and detection of fraud;
  - b) the outcomes of any investigations into allegations of Fraud.

## **7. CONFIDENTIALITY**

The details of investigations, analysis of the facts, allegations, and conclusions, will be disclosed only to those persons who need the information for the investigation, for the implementation of decisions following investigation, or as required by law in line with B.700 Privacy and Access to Information.

## **8 DESIGNATED OFFICER**

The Vice President, Finance and Administration is the Policy Owner, responsible for the oversight of this Policy. The Administration of this Policy and the development, subsequent revisions to and operationalization of any associated procedures is the responsibility of the Directors, Risk Management and Finance.

## **9 RELATED POLICIES**

B.310 Protected Disclosure (Whistleblower) Policy

B.312 Risk Management Policy

B.214 External and Internal Audit Policy

B.506 Standards of Conduct Policy

B.604 Acceptable Use and Security of Electronic Information and Technology Policy

B.700 Privacy and Access to Information Policy

**6. ASSOCIATED GUIDANCE AND REFERENCES**

Office of the Auditor General British Columbia