

Fraud Policy

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Approval Authority Board of Governors	
Implementation Authority University Audit Services	
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1 Purpose

The University of Calgary recognizes the importance of protecting the organization, its operations, its employees, and its assets from the consequences of fraudulent activity.

The purpose of this policy is to:

- a) clearly state the University’s position with respect to fraud, including fraud committed for the benefit of the University;
- b) impose a duty on University employees to report a suspicion of fraud as defined by this policy;
- c) provide protection to those who report suspected fraudulent activity;
- d) ensure a consistent response to reports of suspected fraudulent activity;
- e) outline consequences for fraudulent activity; and
- f) outline filing and reporting requirements.

2 Scope

This policy applies to employees of the University of Calgary except in matters already covered by the Policy on Integrity in Scholarly Activity.

This policy also applies to University consultants, contractors, vendors, and partners to the extent that University resources are involved or impacted and to the extent it is reasonably applicable.

3 Definitions

In this policy:

- a) “Fraud” means a willful or deliberate act with the intention of obtaining an unauthorized benefit by deception or other unethical means. Fraud includes but is not limited to:
 - i. misappropriation of University property;
 - ii. forgery or alteration of documents;

- iii. authorizing or receiving payment for goods or services not received or performed;
- iv. authorizing or receiving payment for time not worked;
- v. altering or deliberately reporting incorrect financial or personal information for either a personal or University advantage;
- vi. unauthorized use of University property and resources for personal advantage or gain;
- vii. any claim for reimbursement of expenses that are not incurred for the benefit of the University;
- viii. bribery;
- ix. identity theft; and
- x. misrepresentation of credentials or status with the University.

For the purposes of this policy, the definition of fraud does not include misconduct already dealt with in the Policy on Integrity in Scholarly Activity.

- b) "Employee" includes a person who is engaged by the University to perform a service.
- c) "Individual" refers to any person considered to be included within the scope of this policy.

4 Policy Statement

4.1 Fraud or the concealment of fraud will not be tolerated at the University of Calgary.

Duty to Report

- 4.2** An individual who is aware of or who suspects fraudulent activity must promptly report such activity in writing to the Director of University Audit Services.
- 4.3** The Director of University Audit Services will advise the complainant when the complaint is filed that, in the interests of justice, it may be necessary to identify the complainant to the respondent.

Investigations

- 4.4** Preliminary investigations into allegations of fraud will be conducted by University Audit Services.
- 4.5** If University Audit Services confirms that the allegation can be reasonably supported on an objective basis in fact and that there is a possibility of wrongdoing such that an investigation is warranted, the Director of University Audit Services will establish a Working Group consisting of one representative from Human Resources and one from University Legal Services as well as the Director of University Audit Services. This Working Group has primary responsibility for the investigation of all substantive allegations of fraud.
- 4.6** The Director of University Audit Services will advise the respondent about the complaint and its particulars and invite the respondent to respond to the evidence either orally and/or in writing before any decision is made by the Working Group.
- 4.7** The Working Group will have the authority to examine, copy, and/or secure the contents of files, desks, cabinets, and other storage facilities on the campus without the consent of any individual. Personal property is excepted.
- 4.8** An individual who is suspected of fraud shall be presumed innocent until or unless the evidence proves otherwise.

- 4.9** An individual who is suspected of fraud shall be requested to cooperate with an investigation carried out under the terms of this policy.

Confidentiality of Information

- 4.10** University Audit Services and the Working Group will treat all information that it collects or receives in confidence except as is necessary for a thorough investigation and resolution of the complaint and/or as required by law or a standard of ethical conduct.

Consequences

- 4.11** When the Working Group completes its investigation, it will submit a final report to specific University officers and the Vice-President (Finance and Services) as outlined in procedures attached to this policy.
- 4.12** An individual who is proven to have committed fraud will be disciplined accordingly. Law enforcement agencies will be notified in cases where the Working Group determines criminal charges may be warranted.
- 4.13** The University will attempt to recover any losses incurred through an act of fraud.
- 4.14** An individual who reports a suspicion of fraud in good faith will be protected from retaliation by employees of the University. Under no circumstances will the individual be threatened, intimidated, or dismissed because he or she acted in accordance with this policy. In addition, every effort shall be taken to mitigate any consequences of the process for other individuals who have been unintentionally adversely affected by it.
- 4.15** An individual who makes allegations of fraud which are proven to be made in bad faith will be disciplined.

Filing and Reporting

- 4.16** If an employee is proven to have committed fraud, information relating to the offence will be placed on the individual's personnel file. The retention of this record will be governed by established University policy.
- 4.17** The Director of University Audit Services will prepare a report containing recommendations for improvements to internal controls that are identified as a result of each fraud investigation.
- 4.18** The Director of University Audit Services will prepare a semi-annual report to Audit Committee containing a summary of all fraud investigations.

Review of Policy

- 4.19** This policy and related procedures will be reviewed one year after the effective date and every two years after that to ensure consistency in practice.

5 Responsibilities

- 5.1** Approval Authority
- a) ensure appropriate rigour and due diligence in the development or revision of this policy and related procedures.

- 5.2 Director, University Audit Services
 - a) receive and investigate allegations of fraud;
 - b) convene and participate in the Working Group.
- 5.3 Employee
 - a) report fraudulent activity to the Director of University Audit Services.
- 5.4 Implementation Authority
 - a) ensure that University staff are aware of this policy and related procedures;
 - b) monitor compliance;
 - c) sponsor the revision of policies and related procedures when necessary; and
 - d) appoint a Policy Advisor to administer and manage these activities.
- 5.5 Working Group
 - a) investigate allegations of fraudulent activity;
 - b) report and recommend appropriate action to specific University officers as outlined in the procedures; and
 - c) report to the Vice-President (Finance and Services).

6 Related Policies [Code of Conduct](#)

7 Related Information [AUPE Collective Agreement](#), Article 15: Disciplinary Action
[TUCFA Collective Agreement](#), Article 20: Discipline Integrity in Scholarly Activity

8 History

November 24, 2004	Recommended for approval by the Audit Committee.
December 10, 2004	Approved by the Board of Governors (Meeting #2, 2004-2005) on the recommendation of the Audit Committee.
January 1, 2005	Effective.
January 1, 2020	Editorial Revision. Updated format and links.